United States District Court
For the Eastern District of Michigan
Southern Division

Dr. Kaitlyn Brower Dressman,
On behalf of herself,
and her deceased unborn child's estate
Plaintiff,

v.

McLaren Healthcare Corporation
McLaren Macomb Hospital
Henry Ford Health
Henry Ford Macomb Hospital
Michigan State University,
Governor Gretchen Whitmer,
in her official capacity as Governor
Attorney General Dana Nessel,
in her official capacity as Attorney General
Secretary of State Jocelyn Benson,
in her official capacity as Secretary of State
Michigan Occupational Safety and Health Administration
Michigan Office of Administrative Hearings and Rules
The United States of America
Former President Donald Trump
Supreme Court Justice Clarence Thomas
Supreme Court Justice John Roberts
Supreme Court Justice Samuel Alito
Supreme Court Justice Brett Kavanaugh
Supreme Court Justice Neil Gorsuch
Attorney General Merrick Garland
Dr. Colleen Shogan,
In her official capacity as Archivist
Defendants

No.

COMPLAINT
[42 U.S.C. § 1983]

Complaint

1. Plaintiff, Dr. Kaitlyn Brower Dressman, on behalf of herself, and her deceased unborn child's estate, against the above-named defendants, their employees, agents, and successors in office, and in support thereof allege the following upon information and belief:

2. Of note, I write this speaking only for myself, and invite other voices to join as amici as appropriate. Any time I state an individual is looking forward to receiving documentation or communication, they are not yet aware they are looking forward to receiving this documentation or communication

Introduction

3. Physicians, surgeons, and public health specialists learn early in our careers that obtaining source control is critical in minimizing the number of individuals affected by a given transferable condition and in saving patients' lives.
    a. Cancerous tumors must be pre-treated with appropriate regimens of chemotherapy and radiation to prepare them for surgical removal, which must be followed up with additional regimens of chemotherapy and radiation as appropriate for a given type of cancer in order to minimize the chance of cancerous cells being left behind to continue growing.
    b. Arteries that are spurting blood must be identified and bleeding must be properly controlled before efforts to mop up blood that's been lost is undertaken in order to maintain the patient's blood pressure and ability to get oxygenated blood to their cells.
    c. Trauma has to stop being perpetuated in order to treat trauma related conditions like post-traumatic stress.
    d. Sources of contamination must be removed from our food, water, air, and soil to prevent neurological disorders, preterm birth, and respiratory diseases among other concerns.
    e. The source of infection must be identified and addressed while appropriate antibiotic is selected, in order to control a potentially lifesaving infection in a timely manner.
    f. Risk factors for suicidal ideation and completion of suicide have to be addressed before they led to worst case scenarios and leave a lifetime of grief in their wake for loved ones left behind.
    g. Our food, toiletries, medications, and sources of information must be monitored to make sure they are safe and of sufficient quality and purity to prevent us from using or ingesting chemicals we didn't intend to use or ingest and getting sick as a result.
    h. Slivers must be removed.

i. Termites, cockroaches, mice and rodent infestations must be addressed by an appropriate exterminator.
j. Umbilical cords must be clamped when newborn babies are delivered.
k. Etc.

4. It all comes down to source control.
5. Often the interventions required to obtain source control are the most drastic, painful, and sometimes disorienting steps taken towards achieving healing and the best intended outcome, and they are only undertaken because there is no other way to achieve that best outcome. These are steps that must be taken in order to save the patient. There simply is no other way.
6. America's civil discourse and civil and political future is at a crossroads that requires we achieve source control on the following problems.
    a. The Unqualified Presidential Candidate in the 2024 Presidential election
    b. Unqualified Supreme Court Justices
    c. The Republican congressional conspiracy against Mormon women, members of The Church of Jesus Christ of Latter-day Saints, Mormons and the women of America
    d. Reproductive Freedom and trafficking women's abortion related trauma
    e. Gun violence
    f. Vaccine bioterrorism
    g. The Death penalty, police violence and sentencing reform
    h. Immigration reform and the trafficking the trauma of migrants, refugees, asylees, and immigrants
    i. Women facing double jeopardy between access to military benefits and student loan forgiveness
    j. Campaign Finance, Voter Disenfranchisement, and Extreme Republican Senators who are conspiring against those that elected them for their own political gain.
    k. Decriminalization of marijuana
7. This is suit is an effort to achieve that source control while vindicating Plaintiff's employment, economic, social, civil and political rights and seeking redress of grievances in hopes that something positive may come out of the wrongful termination of plaintiff's employment for more than just plaintiff.

Jurisdiction and Venue

8. Jurisdiction over this case is conferred on the court by 28 U.S.C. § 1332, 1331, and 1343.
9. Plaintiff is a citizen of the State of Utah and no defendant in this matter is also a citizen of Utah.
10. Venue is proper because a substantial part of the events or omissions giving rise to the claim occurred in this district.

Parties

11. I, Dr. Kaitlyn Brower Dressman D.O., am a resident of the state of Utah.
12. I am an adult female physician who recently suffered a pregnancy loss that has resulted in nearly 2 years of job loss and blacklisting from my profession as a physician. I am living in an apartment in Michigan while I await the resolution of this case and the estate of my deceased unborn child and will graduate with a Master's degree in May.
13. I was a resident physician with Michigan State University, McLaren Healthcare Corporation and McLaren Macomb Hospital from June 23rd, 2021-July 6th, 2022. McLaren still has not paid me my wages from May 21st-July 6th.
14. Michigan State University ("MSU") is a publicly funded university that sponsors and funds McLaren Healthcare Corporation's residency programs in collaboration with McLaren Healthcare Corporation.
15. McLaren Healthcare Corporation and McLaren Macomb hospital (subsequently "McLaren") are a private company and hospital authorized to do business in Michigan that do business in the district. McLaren Healthcare Corporation co-sponsors the residency programs at McLaren Macomb hospital with MSU.

General Allegations

16. I am a 6th generation member of The Church of Jesus Christ of Latter-day Saints. I was born a child of record, and I was baptized and confirmed when I was 8 years old. I became a member of the Relief Society on my 18th birthday before being endowed in the Mt. Timpanogos Temple in April 2015 and sealed to my husband in the Provo Utah Temple in May 2015.
17. I can also trace my bloodlines to the proprietors of Norwich, Connecticut in the 1660s, well before the Declaration of Independence was written.

18. My 3rd great grandfather, Arieh Coates Brower, was one of the undertakers that made the death mask of the founder of The Church of Jesus Christ of Latter-day Saints, Joseph Smith, after he became the first presidential candidate to be assassinated during his campaign in June 1844. Joseph was being held without bail on false charges of treason at the time of his assassination. He was the Lieutenant General of the Nauvoo Legion in command of about 2500 soldiers in the 8500 person military of the United States at the time, the Mayor of Nauvoo and the prophet and President of the Church of Jesus Christ of Latter-day Saints at the time of his martyrdom. His widow, Emma Hale Smith Bidamon, the First President of The Relief Society, was left a pregnant widow at his passing.
19. Another of my 3rd great grandfathers, Edward Bunker, was a member of the Mormon Battalion, the only unit in United States Military history to have been enlisted from a single faith group. The Battalion served for a year during the Mexican American War. The trail they marched defined the Gadsden purchase, which now defines the United States border with Mexico.
20. The United States government has a lengthy history of discriminating against members of The Church of Jesus Christ of Latter-day Saints.
21. The State of Missouri was allowed to issue an extermination order in 1838 that was not rescinded until 1976.
22. The Federal Government passed the Morrill Anti-Bigamy Act of 1862, the Edmund Act of 1872 and the Edmund Tucker Act of 1879 which disenfranchised Mormon women, essentially required Mormon men to register their wives as their property in order to vote as a means of requiring that marriage remained between one man and one woman, disincorporated the Church of Jesus Christ of Latter-day Saints, limited the property rights of The Church of Jesus Christ of Latter-day Saints and its members, forced the country's views about "legitimacy" of children on members of the Church and more.
23. These discriminatory laws were upheld in some this country's very first Supreme Court cases on Religious Freedom including Reynolds v. United States (1879) which upheld the government's right to threaten men who married more than one woman with fines and prison time, Davis v. Beeson (1890) which upheld Idaho law disenfranchising members of The Church of Jesus Christ of Latter-day Saints who didn't have multiple spouses simply for being members of the Church, and Late Corp. of the Church of Jesus Christ of Latter-Day Saints v. United States and Romney v. United States (1890) which disincorporated the Church completely and allowed for the seizure of the Church's

assets including its real property. The Church's temples were never seized though the ruling in Late Corporation allowed for them to be. The Church's property was finally returned in 1893 by Congressional edict once the government was satisfied that members of the Church were following the rules of marriage the government was forcing upon them.

24. President Wilford Woodruff issued "Official Declaration 1" announcing that the Church would comply with the government's demands and that the ***Elders*** of the Church would not teach or encourage plural marriage from thence forth.
25. In addition, Utah had to apply for statehood seven different times before they were allowed to enter the union as the 45th state in 1896, and even then Utah was not allowed to enter on the terms desired by its population without undue influence from what Congress wanted to see from its newest state.
26. Utah first attempted to join the Union as the State of Deseret comprising modern day Arizona, California, Colorado, Idaho, Nevada, New Mexico, Oregon, Utah and Wyoming in 1849. Article III Section 14 of that constitution read, "The right of citizens to keep and bear arms for common defence shall not be questioned."
27. When Elder B.H. Roberts was elected to Congress in 1898 he was not allowed to take his seat.
28. When Elder Reed Smoot was elected to the Senate in 1903 he faced hearings opposing his participating in the Senate as a Senator from 1904-1907. These hearings prompted then Joseph F. Smith to issue the "Second Manifesto" in 1904, again disavowing the practice of plural marriage.
29. Senator Smoot served until 1941, just over 5 years before Senator Mitt Romney was born, demonstrating that the United States Government has struggled to provide equal protections to the rights of the members of The Church of Jesus Christ of Latter-day Saints for the majority of its history. For Mormon women, these abuses are compounded by the Government's ongoing struggles with protecting women's rights as demonstrated with disappointing outcomes in cases like Geduldig v. Aiello and Rostker v. Goldberg and the nonsensical invention of "intermediate scrutiny" in Craig v. Boren, which continue to affect the rights available to American women today.
30. The Selective Training and Service Act of 1940 was the first peacetime draft in United States history. Before the United States entered WWII, the Act required men between the ages of 21 and 36 to register for the draft and those conscripted were required to serve 12 months of active duty with a 10-year reserve component. In August 1941,

active duty serve was extended to 30 months plus any time necessary for national security. On December 20th, 1941, after the United States entered the war, amendments to the act required that all men between the ages of 18 and 64 register, with men between the ages of 18 and 45 being liable for military service for the duration of the conflict plus 6 months. In November 1942, 18 and 19 year olds became liable for military service. This iteration of the draft was allowed to expire on March 31, 1947.

31. The current iteration of the draft was enacted in 1948. In 1954, the Berry plan was enacted during the Vietnam War, which allowed physicians to defer military service until they had finished their training. Provisions of the law resulting in men being inducted into the military expired on July 1, 1973, and the last four physicians to complete their training via the Berry plan entered the military in 1980.
32. President Ford then discontinued draft registration by Presidential Proclamation in 1975.
33. However, President Carter then re-established registration following the Soviet Union's invasion of Afghanistan in 1980. Upon restarting draft registration, President Carter requested that Congress amend the act to include women before funding it, but Congress chose not to do so. Registration of men began on July 21, 1980.
34. The first complaint challenging the constitutionality of the male only draft to reach the Supreme Court, reached the Supreme Court in June 1981, in a case known as Rostker v. Goldberg. In Rostker v. Goldberg, the Supreme Court found that women were not similarly situated for draft registration purposes, and that Congress' decision to exempt women from draft registration "was not the 'accidental by-product of a traditional way of thinking about females" and thus, did not violate the Due Process Clause because "Congress' opinion on what was necessary for our national security was entitled to great deference."
35. On January 23, 2013, then Secretary of Defense Leon Panetta announced that the military would rescind a 1994 directive limiting women's access to more than 238,000 combat positions in the military and open all military positions to women by January 1, 2016.
36. This was a result of a November 27th, 2012 lawsuit, Hegar, et al. v. Hagel, that the ACLU filed on behalf of 4 service women who had all done tours of duty in Iraq or Afghanistan and whose career opportunities in the military were limited by the 1994 "Direct Ground Combat Definition and Assignment Rule." The lawsuit sought to have the 1994 policy rescinded.
    a. That rule read:

i. “A. Rule. Service members are eligible to be assigned to all positions for which they are qualified, except that women shall be excluded from assignment to units below the brigade level whose primary mission is to engage in direct combat on the ground, as defined below.

ii. B. Definition. Direct ground combat is engaging an enemy on the ground with individual or crew served weapons, while being exposed to hostile fire and to a high probability of direct physical contact with the hostile force’s personnel. Direct ground combat takes place well forward on the battlefield while locating and closing with the enemy to defeat them by fire, maneuver, or shock effect.”

37. The Joint Chiefs of Staff had responded to the lawsuit with a letter recommending that all unnecessary gender-based barriers to service be immediately rescinded on January 9th, 2013.
38. A March 2015 study by the US Army Training and Doctrine Command on servicemembers perception of barriers to full gender integration of the military demonstrated four major concerns 1) perceptions of decreased physical fitness abilities 2) pregnancy concerns 3) potential allegations of sexual harassment 4) sexual assault.
39. However, on April 28th, 2016, the Department of Defense backtracked by announcing a new “Leaders first policy,” which required enlisted women to wait to enter these newly opened combat battalions until the battalion had two or more “women leaders.” This policy was not repealed until March 2023.
40. In addition, the marines failed to fully integrate basic training for combat Military Occupational Specialties by the stated January 1, 2016 deadline. The military now hopes to end this sex segregation by 2028.
41. On December 3, 2015, the Department of Defense announced that no gender-based exceptions to service in the military were warranted and that the DOD was ready to move forward with the full implementation of the integration policy by January 1, 2016 as announced in 2013.
42. On April 4, 2013, the National Coalition for Men filed a lawsuit in the United States District Court for the Central District of California seeking to have the male only draft declared unconstitutional and the primary holdings in the 1981 Supreme Court case Rostker v. Goldberg overturned.

43. The District Court for the Central District of California initially dismissed the case, but it was remanded back to the district court for consideration by the US Circuit Court of Appeals for the Ninth Circuit in February 2016.
44. At that time, the parties to the case requested a change of venue, and the case was heard by the United States District Court for the Southern District of Texas. That court determined that the all-male draft was unconstitutional on February 22nd, 2019.
45. Congress created the National Commission on Military, National, and Public Service with the National Defense Authorization Act for Fiscal Year 2017.
46. The commission released an interim report on January 23rd, 2019 outlining the various options available to congress, and then issued its final report recommending that the draft for men be retained and that it be expanded to include young women on March 25, 2020.
47. The United States Court of Appeals for the Fifth Circuit heard oral arguments in National Coalition for Men v. Selective Service System on March 3rd, 2020, just over 3 weeks before the National Commission on Military, National, and Public Service returned its final report recommending the draft be expanded to include women to Congress.
48. A petition for certiorari was filed with the Supreme Court in January 2021, and the Supreme Court declined to hear the case on June 7, 2021 because “Congress was actively evaluating the issue,” citing “the Court’s longstanding deference to Congress on matters of national defense and military affairs cautions against granting review while Congress actively weighs the issue.”
49. I earned my Emergency Medical Technician license the summer after I graduated from high school in 2009.
50. I started at Brigham Young University with both the New Century Scholarship from the state of Utah and an academic scholarship from BYU.
51. I began training in martial arts with the Omega Tao Federation in Utah County Utah in January 2000 and earned my first black belt in 2005, when I was 14. I competed on Team USA and medaled in fighting in the Goodwill Games in Cancun Mexico in January 2012 and I earned my third Dan black belt with the Omega Tao federation in September 2013.
52. Like many elite female athletes my journey included what can only be defined as an eating disorder for a while. Unfortunately, this is all too common in female athletes and there is far too little research and awareness on the topic, causing missed opportunities for prevention and for too many missed diagnoses by unaware providers. I was

beginning research in this area when I was removed from my clinical affiliation with McLaren Healthcare Corporation. This research is on hold pending the resolution of this case and my return to clinical medicine, demonstrating that allowing discrimination to be perpetuated harms more than just the individual experiencing discrimination.

53. I took the Medical College Admissions Test (MCAT) on August 27th, 2014 and scored in the 96th percentile overall and in at least the 95th percentile in each of the subsections, which include Biological Sciences, Physical Sciences and Verbal Reasoning.
54. I interviewed with Touro College of Osteopathic Medicine for admission in November 2015.
55. I was accepted into Touro College of Osteopathic Medicine on January 22nd, 2016.
56. In February 2016, the black belt I was training to take over some of my responsibilities at the Taekwondo studio died by a self-inflicted gunshot wound. She called herself my mini-me. When she had to present about her hero at school, she presented about me. I hope to be half as cool as she thought I was someday. Speaking at her funeral was one of the hardest things I have done or that I will ever do in my life. Her family and I will carry the grief of her loss for the rest of our lives and that is not a weight I would wish on anyone.
57. My magnum opus at the studio before leaving was a demo musical tribute at the July 2016 black belt test in her honor. It also served as an anti-suicide pact for our team.
58. I graduated from Brigham Young University with University honors and a degree in Chemistry with a minor in Spanish in April 2016. My honors thesis was titled, “Retention and Elution of Ferritin, a Preterm Birth Biomarker, from a Reverse Phase Monolith in a Microfluidic Device.” I completed my undergraduate research in Dr. Adam Woolley’s lab. He now serves as the Dean of Graduate Studies at Brigham Young University. During my time in his lab, I won 3 undergraduate research awards and presented on our research at Pittcon, the leading Analytical Chemistry conference in the Nation, in New Orleans, Louisiana.
59. I graduated from Utah Valley University with a degree in Spanish and a minor in Latin American Studies in August 2016. My capstone paper was on developing the ideal public health system.
60. In September 2017, The Deseret News published my open letter to Senator Hatch about the Physician shortage:
    i. https://www.deseret.com/2017/9/27/20620378/letter-sen-hatch-needs-to-help-america-s-doctors-and-most-vulnerable-patients/

61. I published an Op ed on DACA its relationship to the physician shortage in November 2017
    a. https://www.deseret.com/2017/11/22/20623524/op-ed-america-can-t-afford-to-turn-away-her-dreamers/
62. Between my first and second years of medical school I did a research rotation with Columbia University's Stem Cell core on cardiomyocyte like cells.
63. During my second year of medical school, I did research on the effects of maternal stress on the development of the immune system in mice.
64. Throughout 2016 Senate Majority Leader Mitch McConnell refused to hold a confirmation hearing for now Attorney General Merrick Garland after he was nominated to the Supreme Court by President Obama, falsely claiming to be doing so because it was an election year. This occurred despite the fact that Attorney General Garland's nomination had been highly recommended to the Obama administration by several senior Republican Senators.
65. Not only did Senator McConnell refuse to hold a hearing for then Justice Garland Senator, once Donald Trump took office McConnell then lowered the required number of votes for senate confirmation from 60/100 to 50/100. Mr. Neil Gorsuch was seated on the Supreme Court in April 2017.
66. Of note, Senator McConnell has not been willing to make the same change to the filibuster to pass the For the People Act or the George Floyd Justice in Policing Act so that Americans have the same access to the ballot as Senator McConnell's preferred Supreme Court candidates have had to the court.
67. I was in Palestine treating children who had been injured by explosives months and years earlier when Mr. Gorsuch was confirmed to the Supreme Court in April 2018. Work that the American military or State Department would have been wise to have done years earlier if we were serious about building peace in the Middle East. We saw kids with conditions caused by nutritional deficiencies that I will almost certainly never see in the United States, and that we should not be seeing anywhere in the world as they are preventable. Again, conditions that a fully mature United States military that was using all of the tools and people available to it, would have addressed years earlier.
68. During my second year of medical school I became aware of America's physician shortage, and decided to gather letters from classmates and Mormon women around the country about how they were being effected by the physician shortage. I then paired those letters with a summary sheet I had made outlining the issue, and a copy of the

American Association of Medical College's state workforce summaries, and made at least 4 bus trips to Washington DC to meet with members of congress. I gathered the contact information of the healthcare legislative staff for each office so I could help the letter writers follow up and begin building relationships with their congressional offices.

69. By January 5th, 2018 I had delivered letters to 38 Senate offices. Every single office I met with agreed that something needed to be done about the physician shortage in their state and none of them had legitimate criticisms about my proposed mechanism of addressing the problem after I identified several potential funding sources.
70. I returned to DC on Valentine's Day and met with my Representative, Representative John Curtis, and my Senator, Senator Mike Lee, among others.
71. I again returned in March for the American Medical Student Association's conference and then a final time in April for the American Medical Association's annual advocacy conference.
72. In March 2018, Mississippi passed the Mississippi Gestational Age Act, just 11 months after Mr. Gorsuch was seated on the Supreme Court.
73. I was working with Senator Hatch's office to introduce legislation to address the physician shortage that would meet each state's needs, reduce prescription drug pricing and provide funding for marijuana research and gun violence research when I gave up after my April 2018 trip because multiple offices had stated that Senate Republicans were refusing to pass anything with Senator Bill Nelson's name on it during the lame duck year in order to stack the Supreme Court. They didn't care that this also hurt Senator Heller's (R-NV) chance of re-election, they just didn't want Senator Nelson to be re-elected. Senator Heller lost his seat to Senator Jackie Rosen (D), who is a current sponsor of the Resident Physician Shortage Reduction Act. The fact that members of both parties are cosponsoring the act while holding that seat demonstrates that this it likely fills a legitimate need for their constituents, and partisan delays are likely causing legitimate harm.
74. I didn't restart the project after the election because I had started my clinical rotations which made it hard to travel to DC, Senator Hatch was retiring, and the thought of starting all over was disappointing to say the least.
75. I passed COMLEX level 1, my first round of licensure boards, in June 2018 and unwound by researching former President Trump's Supreme Court candidates. I had gone into my research expecting one of the candidates to be my least favorite and came out thinking I would have been ecstatic for that candidate to have been nominated in

comparison to who I feared would be nominated at the end of my research due to his opinion's being the most likely to kill people, the least likely to apply the law equally and the most likely to have gaping logical holes.

76. President Trump gave me the unwanted and unappreciated 27th birthday present of nominating that candidate, Mr. Kavanaugh, on my 27th birthday. I stated at the time that if I were limited to Mr. Trump's shortlist, I would have given Mr. Kavanaugh's seat to Justice Amy Coney Barrett and given Justice Barrett's seat to Justice Joan Larsen.
77. I had contacted my friends in Arizona and asked them to reach out to then Senator Flake about preventing Mr. Kavanaugh's confirmation before he was even nominated I was so certain and concerned he would be the nominee. Needless to say his confirmation process did not improve my opinion of him.
78. Mr. Kavanaugh was then seated in October 2018 after Senator Grassley prevented the Senate from providing informed consent during his confirmation hearing by refusing to listen to his Democratic colleagues or provide them the same access to written records that they've had access to with previous nominee's confirmation hearings. Consent is either fully informed or it's not consent, raising questions about whether Mr. Kavanaugh was legitimately seated on the court in the first place.
79. Nevada became the first state with a majority female state legislature in 2019.
80. My research on my psychiatry rotation in March 2019 was on post-traumatic stress and Critical and Emergency medical care.
81. In March 2019 the Salt Lake Tribune published an Op Ed asking Senator Romney to respect his family history by not supporting Trump's border wall
    a. https://www.sltrib.com/opinion/commentary/2019/03/10/commentary-romney-would/
82. In May 2019, the Deseret News published an op ed by Lisa Bodily Neilsen and I on how the right to asylum helped prevent America from ever becoming complicit in Genocide again
    a. https://www.deseret.com/2019/5/4/20672362/guest-opinion-right-to-asylum-prevents-the-us-from-being-complicit-in-genocide/
83. My last presentation in medical school was on biliary disease in January 2020. After completing my surgical sub-internship in New Jersey in early February 2020, I then went to Cleaveland Clinic in Ohio for my trauma research rotation.

84. On February 5th, 2020, my Senator, Senator Mitt Romney became the first Senator to vote to convict a member of his own party in the first impeachment trial of Donald Trump. I could not have been more proud of my Senator that day.
85. On April 4th, 2020, Governor Andrew Cuomo announced that he was giving my graduating class emergency permissions to begin practicing as resident physicians immediately, before we had graduated from medical school, because New York needed the help. This was the first time this had happened since World War II, and those are the only two times that it has occurred in United States history. Because we had 30 days to get our evaluations submitted to our schools, this effectively drafted me based on the training I had completed as of March 4th, 2020.
86. In April 2021 I published a blog post on the Voices of Mormon Women for Ethical Government blog about my experience graduating from medical school during the pandemic in New York.
    a. https://womenmakingpeace.org/2020/04/awareness-wednesday-battlefronts-part-iv-front-lines/
        i. It begins with a list of "hard firsts" that I'd seen in medical school, including a variety of difficult obstetrical, pediatric, oncologic and end of life situations that "at least I knew they were coming."
87. My National Provider Identifier was generated on April 13th, 2020 and my name was on the list at New York Presbyterian Hospital which is affiliated with Columbia University to begin seeing patients and taking emergency shifts as need that same day.
88. I officially graduated and took the physician's oath on May 1st, 2020:

> "AS A MEMBER OF THE MEDICAL PROFESSION:
> I SOLEMNLY PLEDGE to dedicate my life to the service of humanity;
> THE HEALTH AND WELL-BEING OF MY PATIENT will be my first consideration;
> I WILL RESPECT the autonomy and dignity of my patient;
> I WILL MAINTAIN the utmost respect for human life;
> I WILL NOT PERMIT considerations of age, disease or disability, creed, ethnic origin, gender, nationality, political affiliation, race, sexual orientation, social standing or any other factor to intervene between my duty and my patient;
> I WILL RESPECT the secrets that are confided in me, even after the patient has died;
> I WILL PRACTISE my profession with conscience and dignity and in accordance with good medical practice;

I WILL FOSTER the honour and noble traditions of the medical profession;
I WILL GIVE to my teachers, colleagues, and students the respect and gratitude that is their due;
I WILL SHARE my medical knowledge for the benefit of the patient and the advancement of healthcare;
I WILL ATTEND TO my own health, well-being, and abilities in order to provide care of the highest standard;
I WILL NOT USE my medical knowledge to violate human rights and civil liberties, even under threat;
I MAKE THESE PROMISES solemnly, freely, and upon my honour."

89. On June 4th, 2020 I had an "uninvited guest" invite themselves into my apartment without consent while I was getting out of the shower. I noted on Facebook that my fear during that encounter was that the intruder had a firearm, as I knew I'd be able to take care of myself otherwise.
90. I then moved to New Jersey to begin my internship at the end of June 2020.
91. On August 13th, 2020 the Fifth Circuit reversed the United States District Court for the Southern District of Texas' ruling that the all-male draft was unconstitutional because only the Supreme Court can overturn Supreme Court precedent.
92. On October 8th, 2020, the FBI announced they had arrested 13 men who been involved in a plot to kidnap Governor Gretchen Whitmer of Michigan for her proactive public health measures leading up to the 2020 election.
93. I passed my last round of both the COMLEX and the USMLE exams in October 2020, shortly after Justice Amy Coney Barret was seated on the Supreme Court.
94. The Salt Lake Tribune published my op ed, "This Pro-life Doctor is Voting for Biden" while I was taking my exams:
    a. https://www.sltrib.com/opinion/commentary/2020/10/16/kaitlyn-brower-dressman
95. Desperate to stop watching people die of COVID, in my very, very limited free time, I prepared a patient vaccine guide that explained the COVID vaccine trials, ingredients, and science, and spoke to common concerns and conspiracy theories, had it peer reviewed by board certified Mormon women physicians of a variety of specialties, had it professionally edited and had it ready for circulation the week before the Pfizer vaccine was first approved. It was shared widely across the nation.

a. https://docs.google.com/document/d/1YIJFjBNgqyTzQI3hs5LQfZ4SJrp4kgWuClNT0evpY-I/edit?usp=sharing

96. On January 6th, 2021, a violent mob interrupted the peaceful transfer of power as Congress was counting the Electoral College Votes. Senator Mitt Romney was sent running for his life, away from an armed mob, by Capitol police, inside the Capitol Building while attempting to carry out his constitutional duty and his duty to his constituents.
97. The January 6th insurrection resulted in Mr. Trump's second impeachment, 6 other Republicans joined Senator Romney and voted to convict in February 2021, only 3 of them kept their seats in the senate.
98. On April 20, 2021 Officer Derek Chauvin of the Minneapolis police Department was found guilty of the May 25th, 2020 murder of George Floyd, an unarmed black man former officer Chauvin was arresting.
99. Former Officer Derek Chauvin was sentenced to 22.5 years on May 12, 2021. He was later sentenced to a 21-year concurrent sentence on federal charges. Given former officer Chauvin did not face the death penalty after unquestionably murdering an innocent black man under color of law, all future death penalties are an unconstitutional violation of the equal protection clause, with the possible exception of elected officials, military officers and judges. If a police officer can sit on a man for 9 minutes, several of which that man does not have a pulse, ignoring multiple people asking him to allow them to begin providing first aid, and not get the death penalty, no one is eligible for the death penalty.
100. On April 26, 2021, the Supreme Court agreed to hear New York State Rifle & Pistol Association, Inc. v. Bruen which challenged New York State's 1911 Sullivan Act and its requirement that individuals be able to show cause beyond a typical citizen's need for self-defense in order to obtain a permit to carry a handgun in New York.
101. On May 17th, 2021 the Supreme Court agreed to hear Dobbs v. Jackson Women's Health and decide the Constitutionality of the Mississippi Gestational Age Act, which bans abortions after 15 weeks gestation.
102. A petition for certiorari was filed with the Supreme Court in National Coalition for Men v. Selective Service System in January 2021, and the Supreme Court declined to hear the case on June 7, 2021 because "Congress was actively evaluating the issue," citing "the Court's longstanding deference to Congress on matters of national defense and

military affairs cautions against granting review while Congress actively weighs the issue."

103. I agreed to a 2-year commitment for graduate medical education and training with Michigan State University and McLaren Healthcare Corporation, from July 2021-June 2023 in April 2021.

104. This was to be broken into two consecutive year-long contracts to facilitate a pay raise one year into the two-year agreement. I signed my first-year long contract and returned it in early May 2021.

105. I underwent fingerprinting and a full background check over the weekend of June 10th-14th in order to apply for a Michigan State educational medical license. That license was granted on June 24th, 2021, and I have since upgraded to a full plenary Michigan State Medical license with associated controlled substance license.

106. On September 9th, 2021, President Joseph R. Biden announced he was directing federal Occupational Safety and Health Administration (OSHA) to promulgate regulations under the Occupational Safety and Health Act of 1970 (OSH Act) so employers would know what vaccine and masking requirements they needed to meet in order to meet their duties under the general duty clause of the OSH Act. About 600,000 Americans had died due to COVID at this time, compared to the 300,000 that had died by the time the first vaccines were available in December 2020. As vaccine mandates and killing mosquitoes are the only way America has ever eradicated an infectious disease, this was a prudent and crucial step in ending the pandemic and preventing COVID from becoming endemic.

107. Oral Arguments were held in New York State Rifle & Pistol Association, Inc. v. Bruen on November 3rd, 2021.

108. I ran the NYC marathon on November 6th, 2021.

109. On November 30th, 2022, Ethan Crumbley, a 15-year-old student at Oxford High school in Oakland County Michigan, shot and killed 4 classmates and injured 7 others in a school shooting terrorist attack. His journals demonstrate that he planned to find a "pretty girl" to shoot first in order to make her "suffer like [he] had." This concerning gender based violent ideology is all too common when it comes to mass shootings and terrorist attacks.

110. Crumbley pled guilty to one count terrorism resulting in death, 4 counts of first-degree murder, 7 counts of assault with intent to murder, and 12 counts of possession of a firearm during the commission of a felony on October 24th, 2022.

111. Crumbley was sentenced to life without parole plus 24 years on December 9th, 2023.

112. Ethan Crumbley's parents, James and Jennifer Crumbley, were each found guilty of 4 counts of involuntary manslaughter. Jennifer's trial completed on February 6, 2024 and James' trial completed on March 14th, 2024. Sentencing for, Ethan's parents, is pending, scheduled to begin on April 9th, 2024.

113. James Crumbley has made multiple threats against the female prosecutor in the case in response to his conviction.

114. As a physician who had to beg hospitals in state to get blood to me by ground transport while I waited on the blood that I'd begged hospitals out of state to send to me by air transport because of the blood shortage in the wake of that shooting, I can unquestionably testify that mass shootings and the location of guns effect interstate commerce. The hospital I was seeing patients at didn't even directly receive any of the victims from the shooting, and we still felt the consequences of that shooting to an extent that physicians were calling out of state hospitals begging for blood. I put a request for blood donations on Facebook because I was desperately trying to find my patients the blood donations they needed. Patients suffered and lives were shortened because of that lack of blood caused and exacerbated by that shooting.

115. And, as a physician who both researched gun violence at Cleaveland Clinic, and who has treated gun violence victims in multiple states, I can testify without a shadow of a doubt, that the Oxford shooting is not unique in affecting interstate commerce.

116. Oral Arguments in Dobbs occurred on December 1st, 2021. As I was busy running an ICU during COVID in December 2021 I was not aware of these oral arguments having occurred for several months after they occurred.

117. On December 12th, 2022, I lost an inmate of minority race who wasn't even 30 yet because the jail he was being held at for a minor drug charge hadn't made sure to get him vaccinated in time.

118. On December 16th, 2022, I was assaulted by a patient along with 4-5 other staff members. The patient and his caregivers and family hadn't reported marijuana use upon admission, so staff was not aware that he would likely require higher doses of sedation to keep him comfortably sedated. The patient had been sedated and intubated for seizure control and broke out of his physical restraints by breaking the railings off the bed, taking himself off of life support (a breathing machine), and then assaulting 4-5 staff members who had come to see what the commotion was as he confusedly tried to escape from the unit.

119. This was not an isolated incident. I was assaulted again in March 2022, while pregnant. This time by a patient's family member because I wouldn't override the patient's wishes and implement this family member's wishes instead.

120. And there was more than once that I had to use my body as a shield to keep an unauthorized individual out of a COVID patient's room in December 2021 and April 2022.

121. On January 7th, 2022, I flew from Detroit, Michigan to New Orleans, Louisiana for my first cruise.

122. On January 8th, 2022, I upgraded my wardrobe with several new pairs of Democracy brand jeans and my first bikini, decided it was time to start having kids, and chose to stop taking the birth control pills that I've used to treat polycystic ovarian syndrome since I was in high school. The cruise was a blast.

123. I was in international waters without cell service when the Supreme Court overturned the vaccine mandate in National Federation of Independent Business, et al., v Department of Labor, Occupational Safety and Health Administration Et. Al on January 13th, 2022, and was thus unaware of the decision. Of note, if the Supreme Court had made this ruling before undergoing senate confirmation, and if the senate saw as many deaths as a result of this decision as this decision caused among the general population as a result of this decision, several of the current justices would not have received enough confirmation votes to have been seated on the Supreme Court in the first place.

124. I have a tradition of purchasing baby clothes as travel souvenirs. In keeping with this tradition, I posted a picture of two grey onesies sporting black Rosie the Riveter that I purchased at the WWII museum to my Facebook page with the hashtag #notanannouncement on January 16th, 2022. (While neither I, nor my lawfully wedded husband is black, the friend we were in Louisiana with is.)

125. On February 7th, 2022 my program director announced that I was one of 6 candidates for chief resident. Of note, individuals who have failed their first 6-month long performance improvement plan and are on their second performance improvement plan before termination aren't eligible to run for chief resident.

126. After undergoing intrauterine insemination on February 10th, 2022, I had implantation bleeding with my first pregnancy on February 19th, 2022, and became pregnant as of January 23rd, 2022.

127. The sperm donor to that pregnancy was not in the same state that I was in on either January 23rd, 2022 or February 19th, 2022.

128. I had a positive confirmatory pregnancy test on February 22nd, 2022.

129. Mr. Samuel Alito circulated his brief in the Dobbs case on February 10th, 2022, before I had undergone intrauterine insemination. That brief was signed by Mr. Neil Gorsuch that same day. Mr. Clarence Thomas and Justice Amy Coney Barrett signed on to that brief on February 11th, after I had undergone intrauterine insemination. Mr. Brett Kavanaugh signed on in the days following to provide the 5th vote necessary to overturn Roe v. Wade.

130. On February 25th, 2022, I awoke with dizziness, nausea and vomiting that didn't relent after getting ready for the day. Since I was on a research day with no clinical or administrative duties, I went back to bed so I could be efficient when I did my research that evening. I had no reason to think I needed to let program leadership know of this schedule change as non-pregnant resident physicians aren't required to notify the hospital of schedule modifications and I didn't expect to be treated any differently than my non-pregnant counterparts.

131. Nevertheless, I awoke to multiple text messages from the chief resident, program coordinator and the program director demanding to know where I was. The Program Director had forgotten to schedule someone to give morning lecture and chose to frame me for allegedly no-call, no-showing instead of admitting he'd failed to make sure there was a lecturer that morning.

132. I informed the chief resident of the pregnancy and told him I didn't dare let the rest of program leadership know about it before chief residents were selected the following week on March 4th for fear that it would be held against me after having faced other episodes of gender discrimination at the hospital to that point in my training. I was not referred to a Title IX office like I should have been either at this time or at any point in the future.

133. I was not named chief resident on March 4th, 2022.

134. I attempted to ask for accommodations for my pregnancy under the Americans with Disabilities Act of 1990, the Pregnancy Discrimination Act of 1978 which modified Title VII of The Civil Rights Act of 1964, and Title IX of the Higher Education Act of 1972 in a meeting on March 9th, 2022. Program leadership refused to engage in the interactive process as required.

135. I followed that meeting up with an email asking program leadership to read the Pregnancy Discrimination act of 1978 and do better going forward.

136. In March 2022, Justice Clarence Thomas was not keeping the public up to date with his hospitalization as his wife's text messages implicating her in the January 6th

insurrection were being handed over to the Select Committee on the January 6th attack. A direct contradiction to his expectations of pregnant women.

137. I took my unborn child to see the Nurse Practitioner at our OBGYN's office on March 24th, 2022. She ran a confirmatory blood serum pregnancy test, a complete blood count to check for anemia, and checked my blood type. She checked my thyroid hormone levels. She did a pap smear to check for cervical cancer or abnormal cervical cells, and a urine drug test, urinalysis and urine culture. And, she confirmed rubella immunity and ran a full sexually transmitted infection panel, including HIV, Hepatitis B and C, Chlamydia, Gonorrhea, Syphilis. Testing showed no acute abnormalities. She then ordered our first trimester ultrasound for us to schedule with radiology.

138. That ultrasound happened on April 5th. Although the technician wouldn't let me see the ultrasound screen, the exam left me feeling unsettled, so I attempted to have my OBGYN draw a repeat blood pregnancy test, but she wasn't in her office at the time. So, I went to the urgent care and asked the nurse practitioner there to draw one for me.

139. I was the captain of the ICU resident team when I got the results on April 7th, 2022. The baby I had been so excited to welcome into my family, was dying, and there wasn't anything a doctor on this planet could have done to have changed that.

140. I spoke to my OBGYN on the phone for the first time shortly after diagnosing my pregnancy loss when she called to review the official ultrasound read with me. The radiologist said that the exam was, "concerning for, but not diagnostic of, pregnancy failure" and recommended I repeat an ultrasound and blood pregnancy test in a week. Although I had requested that my OBGYN be faxed a copy of my blood work by the urgent care, she hadn't yet seen it when she called. Upon hearing of the blood results, she agreed there was nothing that could be done to save the pregnancy and we discussed treatment options. Treatment options included "watchful waiting," a medication abortion, or a surgical abortion.

141. My coresident, OBGYN and I all agreed that an immediate surgical abortion that afternoon would have been in both my and my patients' best interest so I could return the next morning when the ICU was busiest and I was needed by my patients most.

142. However, because I had had my blood work done at an urgent care, my medical records weren't picture perfect for taking to court to prove I met the exceptions for Michigan's mandatory 24 hour waiting period before consenting a patient for an abortion and the procedure, and neither the hospital I worked for nor the hospital my OBGYN worked for, would schedule the procedure until the next day. This delay required that I

tell my boss about the procedure and that I wait until I was septic and the situation was threatening to become a life threatening emergency.

143. I completed the Accreditation Council for Graduate Medical Education's (ACGME)'s annual survey on April 11th, 2022. On that survey I reported that I was not happy with the health and safety conditions of the hospital and that I was not getting my evaluations as promised by either my employment contract or as required by the accreditation standards. I was not the only resident that made this complaint. Thus, these complaints were protected and concerted health and safety and EEO activity.

144. The decision in Dobbs v. Jackson Women's Health Organization was published by Publico on May 2nd, 2022.

145. I then worked my last scheduled call weekend from May 6th-10th, 2022 during which I caught a case of postpartum COVID. After not having gotten it for 2.5 years as a frontline physician, this was unquestionably a pregnancy complication, and as we only had 1 patient with COVID in the ICU at the time, I would not have gotten COVID if the Supreme Court hadn't overturned the Biden administration's vaccine mandate on January 13th, 2022. That case of COVID was unquestionably a postpartum complication that the Supreme Court gifted me, and we won't know what cancer risks came with the Supreme Court's experiment that I didn't consent to participating in, for another 50 years.

146. On May 16th, 2022, I was given an ultimatum that I resign by May 20th, 2022 or face termination of my employment after the quarterly Graduate Medical Education Committee (GMEC) meeting the next month. I notified the program of my intent to file an EEOC complaint and appeal the termination before the stated deadline.

147. I was notified of the termination of my employment by the only individual with the authority to terminate my employment on July 6th, 2022.

148. Instead of noticing the trail of blood, carnage, and death that the court had been leaving in its wake since its incorrect earlier decisions in District of Columbia v. Heller (2008) and McDonald v. City of Chicago (2010) and course correcting, the conservative block of the Supreme Court then invented a right to carry a gun without need beyond a typical citizen's need for self-defense in its ruling in New York State Rifle & Pistol Association, Inc. v. Bruen, which was finalized on June 23rd, 2021.

149. Of note, firearms are not allowed in the Supreme Court building, regardless of whether or not one has a permit, a notable and ironic contrast to what Mr. Thomas proscribed for the streets of New York from that Court.

150. Ted Cruz helped author the amici curare briefs and presented oral arguments in District of Columbia v. Heller. Once Citizen's United passed, he and other far right Republicans have used gun violence and fear to fund their campaigns.

151. The Michigan Campaign Finance Act prevented corporations from using treasury expenditures to support or oppose candidates for states office. It was upheld in Austin v. Michigan Chamber of Commerce in 1990 and was considered constitutional until Citizen's United v. FEC in 2010.

152. In 2022, in FEC v. Ted Cruz for Senate Senator Cruz manufactured a case to overturn the $250,000 limit on the amount of money individuals can loan their campaign upfront and then pay themselves back after their campaign.

153. The Dobbs decision was finalized on June 24th, 2022, overturning Roe v. Wade and nearly 50 years of precedent as the law of the land.

154. Crumbley pled guilty to one count terrorism resulting in death, 4 counts of first-degree murder, 7 counts of assault with intent to murder, and 12 counts of possession of a firearm during the commission of a felony on October 24th, 2022.

155. The Higher Education Relief Opportunities for Students (HEROES) Act authorizes the Department of Education to waive or modify certain rules when needed to make sure certain borrowers are protected while they are serving on active duty status or serving with a military operation or as part of a national emergency, living in an area that is declared a disaster area by a federal, state or local area in connection with a national area, etc.

156. The Biden administration intended to invoke this authority to waive $10,000-$20,000 of eligible borrower's debts. However, Missouri and it's "Higher Education Loan Authority of the State of Missouri" filed a lawsuit to prevent this adjustment because it could cost Missouri up to $44 million in lost revenue per year from the student loan asset backed securities they've "invested" in.

157. On December 1, 2022, the Supreme Court granted certiorari in Biden v Nebraska.

158. The military discontinued its vaccine mandate on January 10th 2023.

159. I finally received McLaren's EEOC respondent position statement on January 24th, 2023 after having asked for it repeatedly for months. It was in that document that I learned McLaren was retaliating against me for filing an internal incident and safety report on December 16th and making protected health and safety complaints on the annual survey on April 11th, 2022, so I filed a complaint with the Occupational Safety and Health Administration on January 28th, 2023.

160. The Supreme Court heard oral arguments on February 28, 2023, and on June 30th, 2023, the Supreme Court ruled in Missouri's favor in Biden v. Nebraska.

161. In November 2023, Michigan passed a ballot initiative codifying Reproductive rights in Michigan's constitution.

162. Crumbley was sentenced to life without parole plus 24 years on December 9th, 2023.

163. In December 2023 Texas implemented SB 4, usurping the federal government's sole power over immigration law and enforcement for the State of Texas, and allowing police to arrest anyone suspected of entering the state illegally. A first time conviction carries a sentence of up to 6 months in jail. A second conviction carries up to 20 years in jail. Individuals can have their sentences waived by agreeing to deportation back to Mexico. The 5th circuit stayed implementation with an administrative stay. The U.S. District Court for the Western District of Texas enjoined the law from going into effect on February 29th, 2024, but the Supreme Court let it go into effect in March 2020, pending further litigation.

164. On February 7th, 2024, the Supreme Court of Hawaii correctly ruled that there is not, and that there has not historically been, a personal right to carry firearms in Hawaii, contrary to the United States Supreme Court's incorrect decisions in District of Columbia v. Heller (2008) and McDonald v. City of Chicago (2010).

165. On March 4th, 2024, the Supreme Court found that Colorado could not disqualify Donald Trump from the 2024 ballot based on the 3rd section of the 14th amendment in Anderson v. Trump.

166. Donald Trump became the presumptive Republican nominee on March 12th, 2024.

167. On March 25th, 2024, the American Board of Internal Medicine cancelled my board certification exam that I had finally been allowed to schedule on February 19th, 2020, because McLaren refused to correctly certify that I had completed enough training to be eligible, as yet another example of their ongoing blacklisting. Without passing this exam I cannot work as a physician outside of a residency and without a summative evaluation from McLaren, no other residency program will hire me due to the ACGME's accreditation rules.

168. Since McLaren and Michigan State University wrongfully terminated my employment in 2022, I have filed 6 complaints with the Federal Occupational Safety and Health Agency and Michigan's Occupational Safety and Health Agency, 3 complaints with the National Labor Relations Board, 2 complaints with the Office of Civil Rights of Health and Human Services, 2 complaints with the Office of Civil Rights of Education, a complaint

with the FERPA office, EEOC complaints, a complaint with the wage and hour division, and 2 complaints with the Accreditation Council for Graduate Medical Education, among others, all to no avail.

Analysis of Key Relevant Law and Authorities

169. The Declaration of Independence states, “We hold these truths to be self-evident, that ***all men are created equal***, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness.--That to secure these rights, Governments are instituted among Men, ***deriving their just powers from the consent of the governed***, --That whenever any Form of Government becomes destructive of these ends, it is the Right of the People to alter or to abolish it, and to institute new Government, laying its foundation on such principles and organizing its powers in such form, as to them shall seem most likely to effect their Safety and Happiness. Prudence, indeed, will dictate that Governments long established should not be changed for light and transient causes; and accordingly all experience hath shewn, that mankind are more disposed to suffer, while evils are sufferable, than to right themselves by abolishing the forms to which they are accustomed. But when a long train of abuses and usurpations, pursuing invariably the same Object evinces a design to reduce them under absolute Despotism, it is their right, it is their duty, to throw off such Government, and to provide new Guards for their future security.”

170. Federalist Paper 54 states, “Let the case of the slaves be considered, as it is in truth, a peculiar one. Let the compromising expedient of the Constitution be mutually adopted, which regards them as inhabitants, but as debased by servitude below the equal level of free inhabitants, ***which regards the SLAVE as divested of two fifths of the MAN.*** " (emphasis added)

171. Section 1 of the 13th amendment states, “Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.”

172. Section 2 of the 14th amendment states, “Representatives shall be apportioned among the several States according to their respective numbers, ***counting the whole number of persons in each State***, excluding Indians not taxed. But when the right to vote at any election for the choice of electors for President and Vice-President of the United States, Representatives in Congress, the Executive and Judicial officers of a

State, or the members of the Legislature thereof, is denied to any of the male inhabitants of such State, being twenty-one years of age,* and citizens of the United States, or in any way abridged, except for participation in rebellion, or other crime, the basis of representation therein shall be reduced in the proportion which the number of such male citizens shall bear to the ***whole number of male citizens*** twenty-one years of age in such State."

173. The question in Dobbs was a different version of the question in the 1948 case of Goesart v. Cleary, which, of note, was overturned by Boren v. Cleary in 1976. In Goesart, municipalities in Michigan with a population of at least 50,000 were allowed to prevent women from working as bar tenders unless her husband or father owned the bar. The Supreme Court essentially ruled that pregnant uterus' belong to the pregnant person's husband and father in Dobbs v. Jackson Women's Health Organization. A full-term pregnancy is roughly 40 weeks long. 40 weeks divided by 3/5 twice, once for the pregnant woman's father and once for her husband, gives us 14.4 weeks. A woman would have to be 41 2/3 weeks pregnant before she would reach 15 weeks, at which point not only is the pregnant woman likely miserable, she's at significant risk of fetal demise.

174. The right answer in the Dobbs case was to not enslave the pregnant person in the question, or treat her or her unborn child as property, or answer the question like a tax-law question, or somehow decide that her uterus belonged to her husband and her father instead of the pregnant woman, and to either 1) find that men weren't qualified to make pregnancy related decisions for women without their consent and abstain from taking the case in the first place, or 2) to find that all abortion bans are unconstitutional.

175. Unfortunately for the men of America, the Supreme Court decided instead to render the men of America as 3/5th of a person, which successfully disenfranchises them in the upcoming 2024 election under Section 2 of the 14th amendment.

176. Section 24 of the Edmunds Tucker Act of 1887 says in part, "No person who shall have been convicted of any crime under this act, or under the act of Congress aforesaid approved March twenty second, eighteen hundred and eighty-two, or who shall be a polygamist, or who shall associate or cohabit polygamously with persons of the other sex, shall be entitled to vote in any election." Donald Trump is well known to have had a number of affairs, not all of which were consensual. His mismanagement of the COVID pandemic also killed exponentially more Americans than the September 11th, 2001 terrorist attacks. He is ineligible to run for office in 2024.

177. I'm still too young to run for President, so I'm nominating Senator Mitt Romney as the Republican nominee for President instead. I'm also highly recommending that he talk to Secretary Pete Buttigieg about switching parties and running as his running mate in an effort to infuse new intelligent life into the Republican party.

Cause of Action 1 &2

Breach of Contract and Breach of the Duty of Good Faith and Fair Dealing by McLaren and Michigan State University

178. Plaintiff adopts the above paragraphs as if set forth herein.

179. The ACGME Requirements were incorporated by reference into the Residency Agreements entered into by Dr. Dressman and McLaren Healthcare Corporation, McLaren Macomb hospital and Michigan State University.

180. Defendants McLaren Healthcare Corporation, McLaren Macomb hospital and Michigan State University had a duty to comply with the ACGME Requirements and the other terms of the Employment Contract.

181. McLaren Healthcare Corporation, McLaren Macomb hospital and Michigan State University failed to comply with, and breached their duty to provide me with graduate medical education and training that complied with the ACGME Requirements and all relevant federal law for the 2 years they were contractually obligated to have done so. They have violated my contract in the following ways:

i. I was not provided an initial Individualized Learning Plan in June 2021.
ii. They refused to provide me with access to my monthly rotation evaluations that I was entitled to.
iii. They refused to accommodate my pregnancy and subsequent pregnancy loss as required by the Pregnancy Discrimination Act, the Americans with Disabilities Act, Title IX, or the Elliot Larsen Civil Rights Act.
iv. Upon learning of my pregnancy, they instead added further busy work meetings and classes to my responsibilities, making sure to schedule them with reckless disregard for patient care and wellbeing, by scheduling them at times they conflicted with core responsibilities of my job.
v. They failed to refer me to a Title IX office when I reported gender discrimination to my chief resident.
vi. When I reported my program director's pregnancy discrimination to HR no meaningful investigation was performed.

vii. They retaliated against me for making protected health and safety and EEO complaints in April 2022.

viii. They have refused to verify my training to the American Board of Internal Medicine (ABIM) so I can take my boards or to other residency programs so I can continue my training, despite being obligated to have done so within 30 days of my leaving the program.

182. The actions of Defendants in violating the above-mentioned ACGME standards and other express terms in the Employment Contract was a breach of contract and a failure to perform the duties imposed upon them.

183. In addition, an implied term of every contract is that the parties will perform and/or exercise their discretion in good faith and that they will deal fairly with each other.

184. The false allegations alleged above and the harassment alleged above were performed in bad faith and were not fair dealing and rose to a breach of the Employment contract.

185. As a proximate and direct result of this breach by defendants' plaintiff has suffered injury and damages, including, but not limited to monetary damages, loss of her ability to use her DO degree, loss of time and resources, career opportunities and earning capacity.

186. Thus, Plaintiff, Dr. Kaitlyn Brower Dressman respectfully prays that the Court enter judgement in her favor and against Defendants McLaren Healthcare Corporation, McLaren Macomb hospital and Michigan State University in the amount of $2,000,000 and award consequential damages in an amount to be determined at trial, and for any further and other relief that this Court deems just and appropriate under these Circumstances.

Cause of Action 3, 4 &5

False Light Invasion of Privacy, Defamation, and Civil Conspiracy

by McLaren and Michigan State University

187. Plaintiff adopts the above paragraphs as if set forth herein.

188. In order to avoid admitting to having illegally terminated plaintiff's employment due to plaintiff's pregnancy and subsequent miscarriage, defendants McLaren and Michigan State University have conspired together to create false narratives suggesting that plaintiff's employment was terminated as the result of her poor performance.

189. Defendants McLaren and Michigan State University have shared these false narratives with former coworkers, accrediting agencies, board certification agencies, and potential employers over the past 2 years.

190. Because the legitimate termination of a resident physician's employment would require the resident to fail 2 successive 6-month long performance improvement plans, defendants have concocted false allegations of plaintiff's poor performance having begun almost immediately after starting McLaren.

191. However, Plaintiff was announced as one of 6 candidates for chief resident in February 2022. Residents who had failed a Performance improvement plan are not eligible to be a chief resident candidate.

192. In addition, Plaintiff's contract stated that in the event of non-promotion or termination, McLaren would provide plaintiff with at least 90 days' notice, unless the decision was made in the last 90 days of the contract.

193. Plaintiff was still able to change her time off request on April 7th, 2022, demonstrating that she had not received notice of her impending termination at least 90 days prior to the end of the contract.

194. And, the ACGME requires that residents be supervised and evaluated by board certified physicians on Internal Medicine rotations and that their evaluations be made available to residents within 30 days at the end of the rotation. Resident's terminations must be accompanied by an appropriate paper trail demonstrating that they were appropriately supervised and evaluated by qualified physicians.

195. I was not provided with a copy of a negative evaluation from a board-certified physician by April 30th, 2022 or May 31st, 2022, or within the 6 month time frame McLaren has to place documents in employee's personnel file under Michigan's Bullard Plawecki Right to Know Act.

196. Thus, as McLaren and Michigan State University do not have a legitimate basis for terminating plaintiff's employment, they have engaged in defaming her and placing her in a false light in order to obscure their having fired plaintiff over her miscarriage and related protected activity.

197. As a proximate and direct result of this breach by defendants' plaintiff has suffered injury and damages, including, but not limited to monetary damages, loss of her ability to use her DO degree, loss of time and resources, career opportunities and earning capacity

198. Thus, Plaintiff, Dr. Kaitlyn Brower Dressman respectfully prays that the Court enter judgement in her favor and against Defendants McLaren Healthcare Corporation, McLaren Macomb hospital and Michigan State University in the amount of $3,000,000 and award consequential damages in an amount to be determined at trial, and for any further and other relief that this Court deems just and appropriate under these Circumstances.

Cause of Action 6

Tortious Interference by McLaren and Michigan State University

199. Plaintiff adopts the above paragraphs as if set forth herein.

200. The Accreditation Council for Graduate Medical Education requires residencies to obtain a summative evaluation and program director letter from a resident's previous program before accepting a transferring resident.

201. The Accreditation Council for Graduate Medical Education requires that residencies provide residents a copy of their summative evaluations within 30 days of their leaving the program. I have requested this documentation from McLaren many times and I have yet to receive it.

202. Because I do not have this documentation, and because McLaren will not provide this documentation to other residencies who may be interested in hiring me, in an dishonest attempt to reduce their liability at trial, I have been unable to resume my training elsewhere in order to move on with my career.

203. McLaren and Michigan State do not want me to find success elsewhere as it would further demonstrate that they were the problem, not me. Thus, McLaren has engaged in verbal defamation against me to those employers who have inquired, and then refused to provide me or the inquiring employer with a copy of my summative evaluation.

204. This has effectively resulted in my blacklisting from practicing medicine, simply because I suffered a pregnancy loss.

205. In addition, McLaren is refusing to verify my training accurately to the American Board of Internal Medicine, which is preventing me from taking my Internal Medicine boards in August 2024.

206. The false allegations alleged above and the harassment alleged above were performed in bad faith and were not fair dealing and rose to a breach of the Employment contract

207. As a proximate and direct result of this breach by defendants' plaintiff has suffered injury and damages, including, but not limited to monetary damages, loss of her ability to

use her DO degree, loss of time and resources, career opportunities and earning capacity

208. Thus, Plaintiff, Dr. Kaitlyn Brower Dressman respectfully prays that the Court enter judgement in her favor and against Defendants McLaren Healthcare Corporation, McLaren Macomb hospital and Michigan State University in the amount of $2,000,000 and award consequential damages in an amount to be determined at trial, and for any further and other relief that this Court deems just and appropriate under these Circumstances.

Cause of Action 7 & 8

Intentional Infliction of Emotional Distress by McLaren and Michigan State University

Deprivation of Civil Rights in Violation of the Pregnancy Discrimination Act, Title VII, Title IX, the Pregnant Worker's Fairness Act, The Americans with Disabilities Act.

209. Plaintiff adopts the above paragraphs as if set forth herein.

210. As Plaintiff was both a student in an academic training program and an employee, she should have been protected by Title VII of the Civil Rights Act of 1964 as modified by the Pregnancy discrimination Act of 1978, as well as Title VII of the Higher Education Act of 1972 and the Americans with Disabilities Act of 1990. Had Michigan State University and McLaren properly accommodated plaintiffs status as a pregnant and postpartum woman, plaintiff would not be filing this complaint today. Their failure to honor these laws, despite plaintiff requesting that they do so, both verbally and in writing, demonstrates willful and intentional disregard for plaintiff's civil rights by defendants McLaren and Michigan State University.

211. Termination from a graduate medical education program is an extremely distressing, stressful and traumatic experience. This is well known by all graduate medical educators.

212. Plaintiff knows only one other resident physician who was terminated before completing his or her residency. That individual was not pregnant or postpartum and had not made repeated concerted health and safety and civil rights complaints. That individual died by suicide less than a week after the termination of his or her employment.

213. For a residency program to terminate a resident who is grieving a pregnancy loss without cause, simply because of that pregnancy loss, and then for that residency

program to defame her and isolate her from her coresidents, the only individuals the resident knows in the state of Michigan outside of her faith community, is nothing shy of cruel.

214. For a residency to then blacklist that resident from being able to work in her chosen field for 2+ years following the termination of her employment over that miscarriage, again, is nothing shy of intentional cruelty.

215. As a proximate and direct result of this breach by defendants' plaintiff has suffered injury and damages, including, but not limited to monetary damages, loss of her ability to use her DO degree, loss of time and resources, career opportunities and earning capacity

216. Thus, Plaintiff, Dr. Kaitlyn Brower Dressman respectfully prays that the Court enter judgement in her favor and against Defendants McLaren Healthcare Corporation, McLaren Macomb hospital and Michigan State University in the amount of $2,000,000 and award consequential damages in an amount to be determined at trial, and for any further and other relief that this Court deems just and appropriate under these Circumstances.

Cause of Action 9

Federal Tort Claims Act Claim

217. Plaintiff adopts the above paragraphs as if set forth herein.

218. Since the wrongful termination of my employment in 2022, I have filed 6 complaints with the Federal Occupational Safety and Health Agency and Michigan's Occupational Safety and Health Agency, 3 complaints with the National Labor Relations Board, 2 complaints with the Office of Civil Rights of Health and Human Services, 2 complaints with the Office of Civil Rights of Education, a complaint with the FERPA office, EEOC complaints, a complaint with the wage and hour division, and 2 complaints with the Accreditation Council for Graduate Medical Education, among others, all to no avail.

219. Plaintiff requests compensation under the Federal Tort Claims Act in the form of:

i. $5,000,000 for Dobbs v. Jackson Women's Health Organization having negligently and unconstitutionally overturned Roe v. Wade in direct violation of the clear text of the constitution and having caused her to lose my employment as a result. $1,000,000 for each Justice who voted to violate plaintiff's civil rights.

ii. $5,000,000 for the COVID vaccine mandate having been negligently and unconstitutionally overturned by the extreme right wing of the Supreme

Court, having caused plaintiff to catch COVID as a postpartum complication in a biological experiment conducted by the Supreme Court and Federal Government which I did not consent to participating in and which we will not know the results of for the next 50 years or so.

iii. $1,250,000 for having been subjected to the repeated trauma of responding to numerous school shootings because the government has repeatedly allowed guns to fall into the hands of those who do not have the capacity to possess them safely. This is a particularly reasonable request given violence costs the US government an estimated $250 billion each year.

iv. $ 1,250,000 for medical costs and other financial setbacks and losses incurred as a result of employment loss.

Cause of Action 10

Raising the Bar: Elevating the Standard of Excellence Required to Serve on the Supreme Court

220. Plaintiff adopts the above paragraphs as if set forth herein.

221. Senator Mike Lee and Vice President Kamala Harris are looking forward to receiving either photographic evidence demonstrating a positive pregnancy test between May 17th, 2021 and June 24th, 2022, accompanied by a copy of a current medical license, or the letters of resignation, of Clarence Thomas, John Roberts, Samuel Alito, Neil Gorsuch and Brett Kavanaugh by April 5, 2024.

222. Over the past 5-6 years, the aforementioned Justices have demonstrated they are unable to competently carry out the duties of a Supreme Court Justice in a manner that complies with Rules 1.2, 2.2, 2.3, and 2.5 of the Model Code of Judicial Conduct.

223. As a result, this is a cause of action compelling the Justice's compliance with the documentation request described above.

224. The Patient Self-Determination Act is federal law and remains in force even if a woman is pregnant. The Supremacy Clause of the Constitution says that act is controlling if state law conflicts.

225. Federalist 54 states, "Let the case of the slaves be considered, as it is in truth, a peculiar one. Let the compromising expedient of the Constitution be mutually adopted, which regards them as inhabitants, but as debased by servitude below the equal level of

free inhabitants, ***which regards the SLAVE as divested of two fifths of the MAN.*** " (emphasis added)

226. The California worker's compensation law that was at issue in Geduldig v. Aiello only covered disabilities for 26 weeks and it excluded individuals with drug problems, drinking problems or pregnancy (and by the time the case was heard that was narrowed down to normal pregnancies, and it had come to exclude ectopic pregnancies and miscarriages.) The pregnancy exclusion was upheld to be constitutional in 1974 on the grounds that it was necessary for fiscal solvency, despite the fact that no data supported this reasoning.

227. Of note, a 15-week pregnancy as was at issue in Dobbs, plus the time that the law at issue in Geduldig would cover is the equivalent of a full-length pregnancy and an extra week.

228. The decisions in Geduldig and the decision in Dobbs demonstrate that current Supreme Court jurisprudence gives women the short end of the stick in both directions unnecessarily and that this precedent is to the detriment of society. Both should be overturned as unconstitutional.

229. The question in Dobbs was a different version of the question in the 1948 case of Goesart v. Cleary, which, of note, was overturned by Boren v. Cleary in 1976. In Goesart, municipalities in Michigan with a population of at least 50,000 were allowed to prevent women from working as bar tenders unless her husband or father owned the bar. A full-term pregnancy is roughly 40 weeks long. 40 weeks divided by 3/5 twice, once for the pregnant woman's father and once for her husband, gives us 14.4 weeks. A woman would have to be 41 2/3 weeks pregnant before she would reach 15 weeks, at which point she's at significant risk of fetal demise. The right answer in the Dobbs case was to not enslave the pregnant person in the question, or treat her or her unborn child as property, or answer the question like a tax-law question, or somehow decide that her uterus belonged to her husband and her father, and to either 1) find that men weren't qualified to make pregnancy related decisions for women without their consent and abstain from taking the case in the first place, or 2) to find that all abortion bans are unconstitutional.

230. It took the Supreme Court 103 years after the ratification of the 14th amendment to extend the equal protections clause to gender discrimination. They finally did so in the 1971 case Reed vs. Reed.

231. The key holding in Reed vs. Reed says that it is an unconstitutional violation of the equal protections clause of the 14th amendment to privilege members of one sex of an entitlement class over members of the other.

232. Men are not in the same entitlement class as women when it comes to pregnancy and gestation. (Note the difficulty the male Supreme Court Justices will have with providing Vice President Kamala Harris and Senator Mike Lee a copy of a positive pregnancy test, should the reader have any remaining doubts or confusion on this point.)

233. It follows from Reed vs. Reed that it is an unconstitutional violation of the equal protections clause of the 14th amendment to prioritize someone from a lower entitlement class over someone of a higher entitlement class on the basis of sex.

234. And yet, that is exactly what the men of the Supreme Court did in even voting to hear Dobbs.

235. Even if we assumed for the sake of argument that men and women were of "separate but equal" entitlement classes, it would be a violation of the equal protections clause for a group of men to decide that their judgement should be prioritized over women's right to make their own decisions over their own bodies.

236. As men and women are not of equal entitlement classes when it comes to pregnancy, the very act of any man ruling to even hear the Dobbs v. Jackson Women's Health Organization case was clearly an unconstitutional violation of the equal protections clause of the 14th amendment, as well as the due process clauses of the 5th and 14th amendments, the privileges and immunities clause of the 14th amendment and the takings clause of the 5th amendment.

237. Moving down the list of constitutional problems with the Dobbs decision we come to the fact that per the 14th amendment, citizenship is granted by birth or by Naturalization through the US Congress. Thus, no state gets to change the definition of citizenship through the ongoing abortion wars.

238. The Federal constitution bans Congress from engaging in ex post facto law making, so the Mississippi Gestational Age act would have been unconstitutional even if the right group of lawmakers (the federal legislature) had passed it based on my case alone. Women become pregnant retroactively. Pregnancy starts when upon implantation, as of the first day of the woman's last menstrual period or calculated equivalent in the case of IVF.

239. The 1978 case McFall v. Shimp found that individuals cannot even be forced to give a bone marrow donation against their will, even if their failure to provide that donation will

result in the death of another person. If men and women cannot be forced to provide a bone marrow donation, women cannot be forced to carry pregnancies against their wills.

240. Transplant surgeons cannot harvest organs without the express consent of the deceased's estate. The Dobbs ruling effectively ruled that women in America have fewer constitutional rights than corpses.

241. Pregnant women maintain the right to declare their own health care proxy, who may or may not be the sperm donor to the pregnancy that they carrying, depending on the pregnant woman's wishes.

242. The takings clause prohibits the Supreme Court from taking control of American women's uterus' for whatever purpose the Supreme Court was allegedly serving when they overturned Roe v. Wade in June 2022.

243. Plaintiff is of the belief that this should have been covered in constitutional law 101.

244. Plaintiff respectfully requests President Biden consider appointing America's first all female Supreme Court.

245. While plaintiff believes that Attorney General Merrick Garland is extremely well qualified for the position, she requests that he be tasked with coming up with system improvements that will make sure environmental, health, and other critical factors that are impacted by a case but may not be the focus of the parties litigating the case are more appropriately brought to light and considered by the courts moving forward. (In hopes that the Supreme Court never kills tens, if not hundreds of thousands of Americans in just one or two decisions again.)

Cause of Action 11

Accountability for Congressional Co-conspirators

246. Plaintiff adopts the above paragraphs as if set forth herein.

247. Senator Patty Murray and Vice President Kamala Harris are looking forward to receiving the letters of resignation of Senators Grassley, McConnell, Cruz, Hawley, Hyde-Smith, Kennedy, Lummis, Marshall, Scott, and Tuberville by April 5, 2024.

248. This is a cause of action compelling the Senators' compliance with the documentation request described above.

249. On March 4th, the Supreme Court declared that it was Congress' job to determine if Trump was disabled under the 14th amendment or not in Anderson v. Trump.

250. The Republican party apparatus then demonstrated that it cannot currently be trusted to produce a competent Republican party candidate for the 2024 Presidential election.

251. While plaintiff has qualms with the conclusions in Anderson v. Trump, this numeral is a place holder for naming any Representative or Senator that opposes Donald Trump being declared ineligible for President and his being replaced with Senator Mitt Romney as the presumptive Republican party nominee for President in 2024 as co-conspirators with Mr. Trump, Senators Grassley, McConnell, Grassley, Cruz, Hawley, Hyde-Smith, Kennedy, Lummis, Marshall, Scott, and Tuberville, and the "conservative" bloc of the Supreme Court, once said vote has been taken by Congress.

Cause of Action 12

Donald Trump's Admission of Disability

252. Plaintiff adopts the above paragraphs as if set forth herein.

253. Senator Mitt Romney, President Joseph Biden, and Secretary of Transportation Pete Buttigieg are looking forward to receiving notice from former President Donald Trump that he is immediately suspending his campaign and that he has accepted that he is permanently disabled under the 3rd section of the 14th amendment and thus ineligible to run for President by March 31st, 2024.

254. Plaintiff adopts the above paragraphs as if set forth herein.

255. Biddle v. United States found that the law of the Alaska territory was federal law. For all states to be afforded equal protections, the same has to be true of the law of Utah territory. The Edmunds Tucker Act bars anyone who has cohabited with more than one member of the opposite sex and anyone who has committed adultery from holding office. These laws clearly render Trump ineligible for office.

256. Decision making capacity requires the cognitive capability to:

i. Understand and process information

ii. Appreciate how that information applies to one's situation and the associated potential consequences of how that information applies to one's situation

iii. Reason through risks, benefits, and alternatives of potential actions one could take in response to how that information applies to one's situation in a way that is in line with one's values

iv. Communicate and act upon that decision

v. Decision making capacity is decision specific.

257. Adults are presumed to have decision making capacity.

258. However, concern for a lack of decision-making capacity arises when high value, low-cost interventions, actions or treatments are refused.

259. Those concerns become significantly stronger when the consequences of honoring that refusal could lead to:

i. Imminent danger to self or others

ii. Irreversible illness or loss of function

iii. Death

260. When someone has been deemed to lack decision making capacity, physicians look to a partner, spouse, guardian, healthcare proxy, or person who knows the patient well, for medical decision making.

261. Even when an individual's capacity is impaired, they still retain the right for their values to be respected by their surrogate decision maker and they still retain their right to refuse treatment.

262. Thus, in order to have the capacity to act as a surrogate decision maker, an individual must be able to engage in a 5th skill known as perspective taking.

263. Perspective taking is the ability to put oneself in someone else's shoes and recognize that when making decisions for someone else you must value their personal values as much as you would your own if you were making the decision for yourself and decide accordingly.

264. Trump has demonstrated to America thousands of times over that he cannot be trusted to carry out these 5 tasks safely. He lacks the mental capacity to discharge the powers of the Presidency. As he has already used this incapacity to murder hundreds of thousands of Americans, Trump is disabled under the 3rd section of the 14th amendment.

265. He should voluntarily withdraw in order to avoid prosecution for his war crimes under the Geneva Conventions.

Cause of Action 13

266. Plaintiff adopts the above paragraphs as if set forth herein.

267. Should President Biden, Vice President Harris, Secretary Pete Buttigieg or Senators Lee, Romney or Murray, not receive what they are expecting to receive by April 5th, 2024 as heretofore outlined, this is a cause of action to compel Attorney General Merrick

Garland, or his designated representative, to begin prosecution of the individuals who failed to meet their deadline for violations of the Geneva Conventions, The Racketeer Influenced and Corrupt Organizations Act (RICO) of 1970, section 1983 and all other applicable state and federal law.

Cause of Action 14

Compelling State Election Officials to Declare Trump Disabled in order to not become a co-conspirator

268. Plaintiff adopts the above paragraphs as if set forth herein.

269. This is a cause of action to compel Secretary of State Jocelyn Benson, and her counterparts across the country, to exclude Mr. Trump from the 2024 election ballot and to communicate their intent to do so by April 5th, 2024.

270. Article II Section II of the constitution of Hawaii and Article IV Section 8 of the Utah constitution bars mentally incompetent individuals from holding office.

271. On April 22nd, 2020 when I published a blog about what it was like graduating from medical school in New York City during the COVID pandemic I ended that blog by trying to explain to the public how to begin treating the post-traumatic stress disorder that their healthcare worker loved ones would soon be displaying, if they weren't already displaying it.

272. Donald Trump sent dozens of people to the emergency department having drunk bleach that same day because he suggested ingesting bleach as a potential remedy for COVID. Anyone who understood how the immune system worked knows that we don't need to do those experiments as some of the cells in our immune system essentially use bleach to neutralize pathogens, but the bleach is so toxic it can essentially only be used by cells on a suicide mission. Dr. Birx knew that and could have explained that if she hadn't had credible fear that speaking up and speaking to the President's ideas could cost her her job, which could result in even more deaths and healthcare complications for Americans.

273. Had Mitt Romney or George Bush or any other President in modern history been President from 2016-2020, America would have seen hundreds of thousands fewer COVID deaths and spent far less money responding to COVID.

274. This disparity in performance demonstrates that Mr. Trump lacks the mental capacity to safely discharge the powers of the Office of the Presidency of the United States.

275. In addition, Mr. Trump's rhetoric in his campaign thus far demonstrates that he is willing to be re-elected by violence if necessary and that he will encourage violence during his term in office if he is allowed to return to the White House.

276. Thus, any Secretary of State that allows his or her name to appear on a 2024 ballot is willfully signing up to be a co-conspirator in whatever deaths and violence his election leads to.

277. As we saw with the kidnapping plot against Governor Gretchen Whitmer, not all elected officials and public servants are equally able to carry out the duties of their office safely. Thus, this is a cause of action compelling the 49 chief election officers I can compel with this suit under diversity jurisdiction, and the chief election officer of the State of Deseret, not to allow Mr. Trump's name to appear on their state ballot to make sure all chief election officers can safely protect the ballots in their state.

Cause of Action 15

Ending the Abuse of the Impeachment Process

278. Plaintiff adopts the above paragraphs as if set forth herein.

279. This is a cause of action announcing that starting April 30th, 2022, any member of the House of Representatives that discusses beginning (or continuing) impeachment proceedings or attempts to begin impeachment proceedings against the administration, without a letter of agreement from a reasonable former member of the House or Senate like Liz Cheney, Jeff Flake, or Rob Portman, will do so at the cost of adding their name to the list of co-conspirators and possibility of facing future prosecution for fraud, racketeering, and other acts as applicable.

Cause of Action 16

Rescheduling Marijuana

280. Plaintiff adopts the above paragraphs as if set forth herein.

281. This is a cause of action to compel Attorney General Merrick Garland to require the FDA and the DEA to reschedule marijuana to schedule 2 as required by the plain meaning of the Controlled Substance Act. This can be done based on the currently available research and in keeping with America's international treaties.

Cause of Action 17

Protecting the Right to Life from the Legal Fiction of the Personal Right to Carry a Firearm Without Being Able to Show Cause

282. Plaintiff adopts the above paragraphs as if set forth herein.

283. Cause of action 17 is an action for declaratory confirmation of the facts stated immediately below.

284. The Aloha Spirit as described by the Supreme Court of Hawaii in their decision of February 7th, 2024[1], is hereby declared to be operative in every state of this country under the privileges and immunities clause and the equal protections clause of the 14th amendment, and firearms are no longer to be owned as personal property in the United States of America.

285. Firearms are to be limited to military and police necessity and chains of authority as proscribed by law, with the exception of a minimal number of firearms being available for short term rental from the state for no more than 10-14 days for appropriate hunting outings in appropriate states, and for well-regulated commercial shooting range enterprises. Even use by the military and police shall be as minimal as possible.

286. For the purposes of this action, all jointly owned guns shall be the property of the male head of household.

287. No male individuals shall vote or register to vote without surrendering their firearms, and declaring that they have surrendered all firearms in their household.

288. No female shall register to vote or vote without surrendering their personally owned firearms and reporting any firearms in their home that those who live with them have not yet surrendered.

289. States shall not have electoral college votes from 2024-2032, until 90% of their electorate that are not currently members of the military or members of the police force has surrendered their firearms, and from 2030 onward until 95% of their electorate has surrendered their firearms.

290. The executive authority of each state shall designate the manner in which their citizens shall securely dispose of their firearms in order to regain their right to vote.

Cause of Action 18

291. Plaintiff adopts the above paragraphs as if set forth herein.

292. Senator Mitt Romney, Secretary Pette Buttigieg, Vice President Kamala Harris and President Biden shall form a unity government of co-presidents and co-vice presidents

[1] https://fingfx.thomsonreuters.com/gfx/legaldocs/zdvxnxaqbvx/02082024hawaii.pdf

until enough states shall qualify to participate in a presidential election that a presidential election can be held during the next regularly scheduled time for a Presidential election.

293. Governor Cox of the State of Deseret shall work closely with the 4 unity government leaders as the Governor of the States of Deseret and Utah and the Chair of the National Governor's Association, and shall send a qualified board-certified physician to fill Senator Romney's Senate seat so that there are 2 board certified physicians in the Senate in the event that they need to certify former President Trump as mentally incompetent yet again in order to protect the nation from an additional Trump presidency and the bloodshed that would almost certainly accompany it.

294. Additionally, Governor Cox will be able to provide states' leadership with the contact information of organizations that can provide self-defense training and mental health-based resources and recommendations to states who wish to utilize these resources as they address the armament of their state.

Cause of Action 19

Ending Disenfranchisement

295. Plaintiff adopts the above paragraphs as if set forth herein.

296. In states that have met the 90% or 95% surrender rate, only those individuals who have failed to surrender their guns shall be disenfranchised.

297. Disenfranchisement for all other reasons and infractions shall be unconstitutional under the privileges and immunities, due process and equal protections clauses of the 5th and 14th amendments. Voter disenfranchisement in one state limits citizens access to the ballot, and increases potential threats to the safety of citizens accessing the ballot in other states, as demonstrated by the plot against Governor Whitmer in 2020, and is thus unconstitutional.

298. The elimination of gun violence should free up several hundred billion dollars that Congress can use to address any costs incurred by the rest of the requests and demands in this complaint.

299. If that turns out to be insufficient funding, I hold intellectual property that suggests that TSA does not save enough lives to be worth their continued operation. Their $11 billion budget should be enough to address any remaining needs. If it's not, there's sufficient in negotiating drug pricing and overhauling the research and development funding mechanisms for drug development.

Cause of Action 20

Gun sales and profits are violative of the right to life and due process

300. Plaintiff adopts the above paragraphs as if set forth herein.

301. This is a cause of action to end all gun productions and sales outside of bona fide governmental and police need.

Cause of Action 12

302. Plaintiff adopts the above paragraphs as if set forth herein.

303. This is a cause of action declaring the Protection of Lawful Commerce in Arms Act unconstitutional as it violates the 2nd amendment rights of individuals who are killed by firearms who would not have been killed by firearms if those manufacturing and selling guns were required to find ways for their products not to kill people.

Cause of Action 21

District of Columbia v. Heller and McDonald v. City of Chicago and New York State Rifle & Pistol Inc. v. Bruen are overturned as violative of the right to life, due process clause, equal protections clause and 3rd amendment

304. Plaintiff adopts the above paragraphs as if set forth herein.

305. District of Columbia v. Heller, McDonald v. City of Chicago, and New York State Rifle & Pistol Association, Inc. v. Bruen violate the 3rd amendment of the constitution and the laws they overturned must be allowed to go back into effect as a temporizing measure while guns are eliminated and eradicated from the population. This is a cause of action seeking declarative and injunctive relief.

306. A quick read of the English Bill of Rights of 1689 and a basic understanding of Hawaiian history demonstrate that the 2nd amendment was meant to function as a specific example of the equal protections clause of the 14th amendment that would be enunciated and added to the constitution more than half a century after the bill of rights was drafted, not as a personal right to carry guns at will as it has been misunderstood for the past 16 years by the Supreme Court's right wing. Examining the grammar and wording of the 2nd amendment demonstrates that it is clearly a collective right. (Eg The 2nd amendment speaks of a single state, not 13 or 50 states.)

307. The law of the Alaska Territory was held to be federal law in Biddle v. United States. The same must then hold true for the 1849 constitution of the state of Deseret and the law of the territory of Hawaii. The constitution of the State of Deseret clearly states that

the point of the right to bear arms is collective defense. Hawaiian law does not provide for a right to bear arms or to have arms on the islands.

308. Furthermore, the 3rd amendment requires that homeowners consent to the quartering of soldiers and that soldiers only be quartered as prescribed by law, not by judicial advocacy, which precludes the Supreme Court's current interpretation from being correct.

309. Women did not gain the right to own and control property independently of their husbands in all 50 states until Kirchberg v. Feenstra was decided in 1981. Thus, the only time Congress could have passed a statute that guaranteed a personal right to own firearms and was constitutionally sound under the 3rd amendment's consent requirements would have had to have passed in the last 40-45 years. Congress has not passed such a law.

310. Thus, District of Columbia v. Heller, McDonald v. City of Chicago, and New York State Rifle & Pistol Association, Inc. v. Bruen violate the 3rd amendment of the constitution and the laws they overturned must be allowed to go back into effect as a temporizing measure while guns are eliminated and eradicated from the population.

Cause of Action 22

Death Penalty is unconstitutional

311. Plaintiff adopts the above paragraphs as if set forth herein.

312. This is a cause of action seeking to have the death penalty declared unconstitutional in order to prevent future tyrants from using the death penalty to attempt to create factions the way Mr. Trump has and to prevent plaintiff's tax dollars from being utilized in this unconscionable matter.

313. On April 20, 2021 Officer Derek Chauvin of the Minneapolis police Department was found guilty of the May 25th, 2020 murder of George Floyd, an unarmed black man former officer Chauvin was arresting. Derek Chauvin was sentenced to 22.5 years on May 12, 2021. Former Officer Chauvin was later sentenced to a 21-year concurrent sentence on federal charges.

314. Given former officer Chauvin did not face the death penalty after unquestionably murdering an innocent black man under color of law, all future death penalties are an unconstitutional violation of the equal protection clause, with the possible exception of elected officials, military officers and judges. If a police officer can sit on a man for 9 minutes, several of which that man does not have a pulse, ignoring multiple people

asking him to allow them to begin providing first aid, and not get the death penalty, no one is eligible for the death penalty.

315. This is a cause of action seeking to have the death penalty declared unconstitutional nationwide.

316. It is mathematically impossible to eliminate people killing people by killing more people.

317. If the death penalty were going to stop people committing murder or manslaughter or homicide it would have happened by now.

318. America cannot afford the death penalty. It is literally more expensive than sentences for life without parole. It is impossible to overturn an incorrectly carried out death sentence. And, it opens the door to extremists using it to dehumanize portions of the population.

319. The death penalty also teaches the population that it's okay for the government to kill people or fail to save lives, and that desensitization caries over into other facets of life.

Cause of Action 23

Certifying the ERA as the 28th amendment to the United States Constitution

320. Plaintiff adopts the above paragraphs as if set forth herein.

321. This is a cause of action to compel the archivist to certify the ERA as the 28th amendment of the constitution as of January 15th, 2022.

322. On January 15th, 2020 Virginia provided the final ratification necessary for the Equal Rights Amendment to become the 28th amendment of the constitution on January 15th, 2022.

323. The sole purpose of the 7-year time limit in the text introducing the amendment to Congress is to discriminate against women and to help men maintain social, political and economic power over women in violation of the 14th amendment.

324. The ratification deadline is thus unconstitutional, and the Archivist is obligated to certify the ERA as the 28th amendment as of January 15th, 2022.

325. In 1976, the Supreme Court case Craig v. Boren from Oklahoma overturned the 1948 precedent set in Goesaert v. Cleary in Michigan.

326. In 1948 Goesaert v. Cleary held that it was not an unconstitutional violation of the Equal protection clause to allow local governments with populations of at least 50,000 to prohibit women from bar tending unless their husband or father owned the bar at which they were working.

327. In 1976 Craig v. Boren overturned this decision by overturning Oklahoma's laws requiring men to be 21 to purchase alcohol while only requiring women to be 18 to purchase alcohol because the state could not provide statistically significant evidence demonstrating that the policy was effective at meeting it's stated end.

328. The Supreme Court should have held sex, gender, sexual orientation, and legitimacy to the same strict scrutiny standard it holds religion and race to, and adopted an evidence-based policy standard for evaluating competing interests.

329. However, because the Equal Rights Amendment was pending before the states at the time, the court rationalized continuing the unworkable, "Intermediate scrutiny" of review for sex, gender, orientation, and legitimacy that they had used in Frontiero v. Richardson in 1973. As the continued use of intermediate scrutiny now calls the judiciary's understanding of basic biology into question, it's time for this wrong to be righted by intermediate scrutiny being replaced with strict scrutiny and evidence-based decision making.

330. All embryos are simultaneously female and intersex until 6-8 weeks gestation. At this point in development the effects of the Sex-determining region of the Y chromosome or "SRY gene" begin to take place in male embryos causing them to lose their future capacity for pregnancy and develop male sex traits. When this occurs male embryos and fetuses have fallen from the entitlement class they once shared with their sisters and intersex kin, never to return.

331. X and Y chromosomes are not created equal in the XY human sex differentiation system. X chromosomes are necessary for life. Y chromosomes are not. A single X chromosome can sustain life, while Y chromosomes must be accompanied by an X chromosome to survive.

332. Legitimate differences caused by these different chromosomes will be measurable.

333. My high school geometry teacher didn't allow the "looks like theorem" in our mathematical proofs in high school and the federal judiciary cannot continue to allow it with their intermediate scrutiny standard either.

334. Pregnancy is always a sex-based characteristic.

335. Geduldig v. Aiello was an inappropriate case for the Supreme Court to have based its decision in Dobbs on. The Pregnancy Discrimination Act of 1978 overturned that precedent more than a decade before I was born and I knew that to cite it to my employer in March 2022. I haven't attended law school.

336. Regardless of the fact that it's out of date and no longer relevant precedent, Geduldig v. Aiello was inappropriately decided from the get-go. Geduldig was a combination of 2 class action suits, one including women with normal pregnancies and one including women with pregnancy related complications. The California appeals board rendered the case with the pregnancy related complications moot before Geduldig was heard, leaving just the normal pregnancies and childbirth. They then irrationally held the discrimination was constitutional in order to maintain the fiscal solvency of the program.

337. In 1830 Thomas Jefferson wrote, "I know no error more consuming to an estate than that of stocking farms with men almost exclusively. I consider a woman who brings a child every two years as more profitable than the best man of the farm. what she produces is an addition to the capital, while his labors disappear in mere consumption."

338. The Conservative bloc of the Supreme Court also knows that what a woman "produces is an addition to the capital, while his labors disappear in mere consumption" as they literally answered the question in Dobbs like a tax question instead of a life, health and safety question, but they did so on the basis that it's supposedly too expensive to pay women what they're worth and support them while they're creating that addition to the capital.

339. The Supreme Court would be hard pressed to find data supporting the fiscal intelligence of choosing to deny pregnant women the employment benefits like paid medical and family leave, unemployment and worker's compensation that they need to be able to both have children and be productive employees like California did in the 1940s as was at issue in Geduldig, instead of investing in their most productive employees. They would have avoided an embarrassing decision if all decisions were required to be data based.

340. They also would be hard pressed to find data supporting abortion bans as abortion bans save no lives. They kill people. If the courts would require data and proof, they'd stop being fed political lies like 15-week abortion bans that really just tailored to trap women who find devastating diagnoses at their 2nd trimester anatomy scan ultrasound and 2nd trimester genetic screening. 95% of abortions have happened by 15 weeks. Those bans do nothing to end the abortion problem. In fact, they do the opposite and keep abortion in the news as a political fundraiser for right wing politicians that would rather create problems to not solve then actually do their constituents any real favors.

Cause of Action 24

Voting Rights and Campaign reform

341. Plaintiff adopts the above paragraphs as if set forth herein.

342. This is a cause of action seeking injunctive relief to allow the precedent in Michigan Chamber of Commerce v. Austin to go back into effect and to require Congress to pass the For the People Act in order to provide women and racial minorities equal access to the ballot box and equal power at the ballot box.

343. As Thurgood Marshall stated in Michigan Chamber of Commerce v. Austin, "Michigan identified as a serious danger the significant possibility that corporate political expenditures will undermine the integrity of the political process, and it has implemented a narrowly tailored solution to that problem. By requiring corporations to make all independent political expenditures through a separate fund made up of money solicited expressly for political purposes, the Michigan Campaign Finance Act reduces the threat that huge corporate treasuries amassed with the aid of favorable state laws will be used to influence unfairly the outcome of elections."

344. If Congress can limit The Church of Jesus Christ of Latter-day Saints to owning no more than $50,000 as Congress did in the Morrill Anti-bigamy act, we can prevent Republicans from getting elected by trafficking women's abortion trauma and arming teenagers to commit terrorist attacks in our schools, contrary to the decision in Citizens United v. FEC.

Cause of Action 25

Bringing the Selective Service Military Draft into compliance with the Equal Protections Clause

345. Plaintiff adopts the above paragraphs as if set forth herein.

346. This is a cause of action seeking to have the male-only draft declared unconstitutional and to require that men and women be similarly registered so as to most effectively use all of America's talent and reduce the number of wars being fought around the globe.

Cause of Action 26

Equality in Taxation

347. Plaintiff adopts the above paragraphs as if set forth herein.

348. This is a cause of action seeking declaratory relief and to require Congress to amend the tax code so as to eliminate the marriage and single penalties or marriage bonus in order to bring the tax code into compliance with the requirements of the equal rights amendment and the equal protections clause of the 14th amendment.

Cause of Action 27

Protecting Reproductive Freedom and Healthcare Nationwide

349. Pllaintiff adopts the above paragraphs as if set forth herein.

350. Birth control, like 99% of all medications developed in the United States, was developed with public funding.

351. Women are equally entitled to access to publicly funded goods and thus have a right to access birth control, included emergency contraceptives and the morning after pill, regardless of any man's religious belief or opinion or any group of men's or corporation's opinion.

Cause of Action 28

Right to select method of pregnancy termination

352. Plaintiff adopts the above paragraphs as if set forth herein.

353. Women have a right to choose whether to end their pregnancy with watchful waiting, medication, or a procedure according to their personal preference and circumstances. The courts shall not turn doctors into mandated rapists by eliminating access to birth control or medication abortion or mandating unnecessary transvaginal ultrasounds, either directly or directly, unless clear and convincing statistically significant evidence that such medications are unsafe is uncovered.

354. No lives are saved by banning any of the methods available and lives are put at risk when these bans are enacted. Thus, the judiciary is required not to implement bans on any of these methods without the production of significant new, accurate and precise data in support doing so.

Cause of Action 29

Abortion bans are Unconstitutional

355. Plaintiff adopts the above paragraphs as if set forth herein.

356. This is a cause of action seeking declaratory relief of the following:

357. That all pregnant women retain the ability to name their own healthcare proxy for use as needed per the clinical judgement of their attending physicians and that that

healthcare proxy does not have to be the sperm donor of the pregnancy they are carrying or their lawfully wedded husbands.

358. Abortion bans kill people. They save no lives. Until someone can provide rigorously tested proof to the contrary about a given ban, all abortion bans are hereby declared unconstitutional.

Cause of Action 30

Protecting Reproductive Rights for Women Nation wide

359. Plaintiff adopts the above paragraphs as if set forth herein.

360. In November 2023, Michigan passed a ballot initiative codifying Reproductive rights in Michigan's constitution as Article I Section 28

361. This is a cause of action seeking a declaration that those rights be declared operational nationwide under the equal protections clause, the due process clause and the privileges and immunities clause of the 14th amendment:

> Sec. 28.
>
> (1) Every individual has a fundamental right to reproductive freedom, which entails the right to make and effectuate decisions about all matters relating to pregnancy, including but not limited to prenatal care, childbirth, postpartum care, contraception, sterilization, abortion care, miscarriage management, and infertility care.
>
> An individual's right to reproductive freedom shall not be denied, burdened, nor infringed upon unless justified by a compelling state interest achieved by the least restrictive means.
>
> Notwithstanding the above, the state may regulate the provision of abortion care after fetal viability, provided that in no circumstance shall the state prohibit an abortion that, in the professional judgment of an attending health care professional, is medically indicated to protect the life or physical or mental health of the pregnant individual.

(2) The state shall not discriminate in the protection or enforcement of this fundamental right.

(3) The state shall not penalize, prosecute, or otherwise take adverse action against an individual based on their actual, potential, perceived, or alleged pregnancy outcomes, including but not limited to miscarriage, stillbirth, or abortion. Nor shall the state penalize, prosecute, or otherwise take adverse action against someone for aiding or assisting a pregnant individual in exercising their right to reproductive freedom with their voluntary consent.

(4) For the purposes of this section:
A state interest is "compelling" only if it is for the limited purpose of protecting the health of an individual seeking care, consistent with accepted clinical standards of practice and evidence-based medicine, and does not infringe on that individual's autonomous decision-making.

"Fetal viability" means: the point in pregnancy when, in the professional judgment of an attending health care professional and based on the particular facts of the case, there is a significant likelihood of the fetus's sustained survival outside the uterus without the application of extraordinary medical measures.

(5) This section shall be self-executing. Any provision of this section held invalid shall be severable from the remaining portions of this section.

Cause of Action 31

The Hyde Amendment is unconstitutional

362. Plaintiff adopts the above paragraphs as if set forth herein.

363. The Supreme Court held in Biden v. Nebraska that the Biden administration couldn't forgive my student loans covering my learning how to perform pregnancy termination procedures as a medical student.

364. Medicare pays residents who are performing pregnancy termination procedures regardless of the basis for the procedure.

365. A resident performed my termination procedure on April 8th, 2022. He or she was paid by Medicare.

366. My private insurance paid the board certified OBGYN that supervised the resident who performed the procedure.

367. Its an unconstitutional violation of the Equal Protections clause for public funding to pay the mixed sex group of providers who are performing the procedures, and bill the mixed sex group of students who are learning to perform the procedures, while refusing to pay the female sex only group of women who are receiving abortion procedures.

Cause of Action 32

Mandating Comprehensive Sexual Education without parental option to opt out

368. Plaintiff adopts the above paragraphs as if set forth herein.

369. This is a cause of action to mandate that all teenagers be provided comprehensive sexual education in school without parental right to opt in or out.

370. Consent is only consent if it is fully informed consent. The state owes its teenagers and young adults the information they need to start life on the right foot.

371. I have seen far too many patients in over half a dozen states who did not recognize that they had been raped when they sought medical care after a rape and who did not even have the anatomical terminology to tell doctors what happened to them when they were raped.

372. Sexual education is necessary to address the epidemics of sexually transmitted diseases we still face in America. Thus, the child's or teen's right to comprehensive sexual education trump's "parental rights to parent their child"

373. States shall have a duty to provide k-12 students with age appropriate comprehensive sexual education that includes relationship and consent skills.

Cause of Action 33

Michigan's 24 hour wait time on abortions is unconstitutional

374. Plaintiff adopts the above paragraphs as if set forth herein.

375. The state of Michigan requires individuals obtain a college degree, graduate from medical school, pass a series of board exams in a proscribed amount of time, complete graduate medical education and training, and submit fees, proof of ongoing education and an application in order to practice medicine in the state of Michigan.

376. The legislature violated Michigan state licensure law when they attempted to practice medicine without a license and passed the 24-hour mandatory waiting time. I sincerely believe that because of their failure to comply with the licensure requirement that licensure be obtained before practicing medicine, that this statute is null and void and must be struck from the books. And, since enacting my belief into law will save more lives than leaving the ban on the books will, failure to legislate based off of my belief in this instant will constitute an unconstitutional establishment of religion.

377. Medicine is an autonomous profession. Require annual mortality and morbidity reports and action plans for improvement any day of the week and I will not complain. But when I need the legislature to mis-prescribe treatment plans and make it harder for me to save lives, I will let them know. Until then, their job is to not make my job of keeping people alive harder.

378. What's more, the 24 hour waiting time is an unconstitutional violation of the equal protection clause of the 14th amendment.

379. Once pregnancy has begun the time for state mandated education is over. Any efforts to mandate patient education during an abortion is an admission by the legislature that they did not properly educate the patient in school before they got pregnant. Legislatures offering such mea culpas lack the moral authority to intrude on the physician patient relationship.

Cause of Action 34

Access to divorce during pregnancy

380. Plaintiff adopts the above paragraphs as if set forth herein.

381. This is a cause of action to declare all laws preventing pregnant women from seeking divorce on the same timeline as a man who is married to a nonpregnant partner are unconstitutional.

382. I see pregnant patients in Missouri 1-2 weekends a year and Missouri is one of the states that does not allow pregnant patients to seek divorces during pregnancy.

383. States that do not allow pregnant women to seek or obtain a divorce during pregnancy were significantly more likely to have Representatives or Senators who objected to the 2020 election or were otherwise involved in the insurrection that occurred during the certification of the 2020 election.

Cause of Action 35

Use of marriage licenses to declare women the property of their partner's is unconstitutional

384. Plaintiff adopts the above paragraphs as if set forth herein.

385. Thus, once 95% of the electorate of each state has surrendered their firearms, this is a cause of action to end marriage licenses in that state, until marriage licenses have ended nationwide.

386. In addition, not allowing pregnant women to seek divorce encourages the use of marital rape as a political tool and weapon and increases the risk of sex trafficking and domestic violence.

387. In addition to being a violation of the equal protections clause of the 14th amendment, the Morrill anti-bigamy, Edmund act, Edmund tucker act of 1887, and any other state or federal bans on polyamory, polygamy, plural marriage or celestial marriage violate the Clayton Antitrust Act's ban on exclusive dealing and thus must be overturned as unconstitutional.

388. Embryos currently can, or will shortly be able to, contain genetic material from 3 separate parents, two nucleic DNA donors and a mitochondrial DNA donor.

389. In addition, an embryo's female DNA donor and mitochondrial DNA donor may not be that embryo's gestational carrier, and that embryo may grow into an infant that is adopted by 2 additional individuals that weren't involved in DNA donation process or the gestational process.

390. That's a total of 6 individuals contributing to the creation of a newborn.

391. Three of those six roles must be played by a female, only one of those six roles must be played by a male, and sexual intercourse may or may not have occurred amongst any of the individuals involved as part of the creation of that newborn.

392. It is healthier for society to acknowledge relationships as they are, in all of their complexity, instead of continuing to fight to force that complexity into a binary model that we've now outgrown in order to uphold male power structures.

393. Additionally, women are not property and the ban on plural marriage and the mandatory licensure of marriages is unconstitutional under the equal protection clause.

394. The Morrill Anti-Bigamy Act of 1862, The Edmund Act of 1882 and the Edmund Tucker Act of 1887 were implemented in pursuit of the specific aim of disenfranchising Mormon women and minimizing the political influence of Mormon men.

395. These laws required that Mormon men literally register their wives as their property in sworn affidavits in order to vote in order to facilitate ongoing governmental oversight and discrimination of their personal affairs.

396. While these efforts may have been seen as in women's best interest in the 1800's, by groups of men who didn't bother to ask any significant number of women of their opinion on the matter, anyone who still thinks that men treating women as property is in women's best interest is more than a few cards shy of a full deck of cards in the IQ department.

397. Thus, once 95% of the electorate of each state has surrendered their firearms, and once all necessary arrangements for providing equal protections to same sex couples as to heterosexual couples have been made in each state, this is a cause of action to end marriage licenses in that state, until marriage licenses have ended nationwide.

Cause of Action 36

Requiring women's full economic suffrage

398. Plaintiff adopts the above paragraphs as if set forth herein.

399. If a country has the authority to exercise parens patriae principles over a 15 week old fetus as the Supreme Court claimed they did in 2022, they also have the authority and obligation to:

i. provide a generous enough child tax credit to both eliminate child poverty and provide comprehensive antenatal maternal and prenatal care

ii. provide paid family and medical leave that allows both parents to take time away from the paid labor force to bond with a newborn,

iii. compensate primary caregivers of all US citizen children and children in the jurisdiction of the United States, as the valuable labor that it is

iv. and protect the parents of US citizen children from deportation so as not to separate parent and child

400. This is a cause of action to compel congress to provide for the aforementioned programs as part of implementing the Equal Rights Act and providing women across America with the same access to the economy that men currently enjoy.

Cause of Action 37

401. Plaintiff adopts the above paragraphs as if set forth herein.

402. This is a cause of action to bar Texas from continuing to interfere in the federal government's ability to carry out their preferred policies in this arena by using the courts to draw attention to their extreme, unrealistic and often cruel state policies that the constitution says they should not even be enacting in the first place.

403. Naturalization and Immigration are squarely in the federal legislature's purview per the 14th amendment and Article I Section 8 of the Constitution.

404. America's current approach to immigration is the equivalent of attempting to start competitions with our southern neighbors over which country can cause or permit the worst human rights abuses. This is intentionally done by Texas and Florida Republicans in order to keep Immigration a hot item campaign issue. It is cruel and unusual.

405. The other option is for congress to call Former Senator Sasse of the University of Florida and President Shane Reese of BYU and all of their counterparts at the universities around the nation and create a coordinated program where adults and young adults can partner with communities around the world to address the concerns in their communities that are driving them to our borders, or borders like ours, and where institutions of higher learning can invite individuals who may not otherwise have the means to spend a semester or more on their campuses so they can better serve their communities upon their return home.

406. While asking the co-Presidents and co-Vice Presidents to implement such a program is likely beyond the scope of the judiciary, although though immigration is being used to disenfranchise protected classes in the electorate, reminding the 5th circuit court of appeals and Supreme Court that Texas is one of the 50 little "s" states and they don't get a say in immigration policy, that's the purview of the Big "S" State that's overseen by the federal government per the constitution is squarely within the court's realm of authority and would be appreciated.

Cause of Action 38

Providing for future vaccine mandates

407. Plaintiff adopts the above paragraphs as if set forth herein.

408. This is a cause of action requiring Congress to make the Occupational Safety and Health Act of 1970 sufficiently idiot proof that the next time a President needs to implement a vaccine mandate that will save hundreds of thousands of lives the Supreme Court won't stop her from doing so.

Cause of Action 39

Requiring Government to become reality-based

409. Plaintiff adopts the above paragraphs as if set forth herein.

410. This is a cause of action requiring the new unity government to implement a data-driven, reality-based, government that:

i. is accountable to the people (each program has established targets and measurable metrics so progress can be tracked, and periodic adjustments can be made as part of a continual improvement program),

ii. recognizes that choices and consequences come as a package deal,

iii. balances the budget while providing a generous safety net and meeting everyone's needs,

iv. understands we only have one earth to share,

v. demonstrates to America that we can work together to meet everyone's needs even though the needs of each state will likely differ in places.

vi. Provides quality and affordable comprehensive healthcare including podiatry, dental, vision, chiropractic, drug and vaccination coverage, to everyone within the jurisdiction of the United States

Cause of Action 40

411. This is a cause of action requiring Congress to join the WHO Framework Convention on Tobacco Control and prohibiting elected officials from taking money from the tobacco industry as a violation of their constituents' 5th amendment due process rights.

Cause of Action 41

412. This is a cause of action seeking the forgiveness of plaintiff's student loans and the reversal of the finding in Nebraska v. Biden as it is violative of federal antitrust law as Missouri's "Higher Education Loan Authority of the State of Missouri" now has a monopoly on all Public Service Loan Forgiveness loans and they should not be seeking self-financial aggrandizement at the expense of student borrowers.

Respectfully submitted,

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